

# **VERMONT PERKINS V STATE PLAN**

**WORKING DRAFT FOR PUBLIC COMMENT**

**January 24, 2020**

Issued by the Vermont Agency of Education



## Note to Readers:

This is a working draft. The draft will be updated to respond to comments after the public comment period ends. The headers represent questions the U. S. Department of Education requires to be answered.

The public comment period is:

Wednesday, Jan. 22, 2020, to Friday, Feb. 21, 2020 at 4:30 p.m.

Comments must be submitted in writing to:

[aoe.PerkinsComments@vermont.gov](mailto:aoe.PerkinsComments@vermont.gov)

Comments may address the plan overall, or may be directed at the accountability section, or both. Comments pertaining to accountability/levels of performance, as required by the law (section 113(b)(3)(B)), shall be limited to the following three topics:

1. How or whether it meets the requirements of the law;
2. How or whether the approach support the improvement of performance of all CTE concentrators, including historically marginalized students, and special populations defined in the Act;
3. How or whether it supports the needs of the local education and business communities.

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# 1. INTRODUCTION

## State Context

*Vermont is a small rural state, with a population of roughly 623,989. The Vermont economy depends on a diversified mix of manufacturing, private education, healthcare, tourism, professional services and public-sector employers. Agriculture remains an important component of the state's economy and cultural image.*

*In northwestern Vermont, Chittenden County provides nearly one third of the state's jobs and serves as the economic hub of the Vermont economy. Burlington and South Burlington make up the core of the state's only Metropolitan Statistical Area (MSA). The area employs thousands of workers in retail, construction, manufacturing, education, healthcare and tourism industries. The MSA extends into parts of Franklin, Grand Isle and Addison counties.*

*Bennington and Windham Counties have worked to maintain a balance between economic development and preservation of the rural working landscape. Easy access from northeastern urban centers (e.g., Boston, New York City) has put pressure on the region for second home development, and related construction workforce demands. In addition, ski resorts in the area have expanded to provide self-contained winter recreation facilities.*

*Orange County, along the Connecticut River has close ties to neighboring New Hampshire (NH) communities. The northern part of Windsor County benefits from its proximity to Hanover, NH, which employs many Vermont workers in education and health-care.*

*Bennington and Rutland counties, in the southwestern quadrant of the state, provides a wide range of recreation and tourist activities. It is a popular area with visitors from adjoining New York State. The counties are also home to many manufacturing, retail and healthcare employers.*

*While central Vermont [Washington County] is well known because of the capital city, Montpelier, the region also contains a diverse economy with an interesting industrial history. Granite quarries provide stone for monuments and construction all over the world. Granite workers pass on a tradition of craftsmanship that turns granite slabs into works of art. In addition to its large public sector, the central Vermont area has strong insurance and financial services sectors, and many healthcare and social assistance employers.*

*Lamoille County in north central Vermont has a high concentration of service industry jobs related to seasonal recreation and tourism. Recent resort expansion and*

development has provided construction and retail jobs for the area. Essex, Orleans and Caledonia counties in northeastern Vermont, known collectively as the Northeast Kingdom, contain some of the last remnants of a rural, undeveloped New England. The forests provide income for loggers and serve as a resource for furniture and other wood product manufacturing. Residents of the Kingdom report income levels among the lowest in the state and poverty rates among the highest.

Vermont’s State Plan, Workforce Innovation and Opportunity Act, 2018

**Required Narrative B: [1] State's Vision for Education and Workforce Development:  
[b] strategic vision and goals for preparing an educated and skilled workforce**

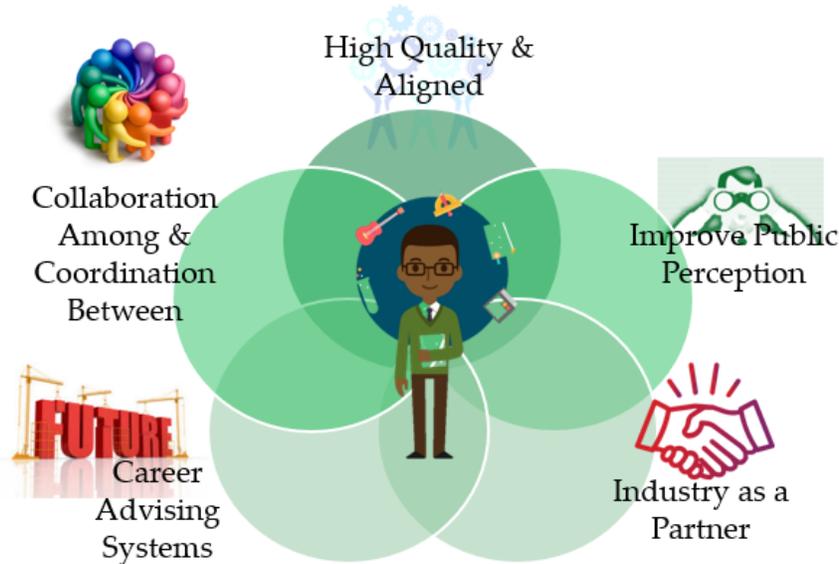


Figure 1: Vermont CTE is student centered

In late winter 2018, and in anticipation of Congress passing a reauthorized version of Perkins in the near future, the Agency of Education (AOE) engaged in a six month long multi-phase process to involve the public and interested stakeholders in developing a strategic vision and aspirational goals for career technical education (CTE) in Vermont. We interviewed a cross-section of stakeholders including students, parents, CTE administrators, school administrators, industry representatives, workforce development partners, and policy makers. A fifty-question online survey was deployed over a three week period with more than 40% of the responses obtained from students and families; and we held an all-day in-person meeting with a broad group of stakeholders who helped us interpret the data we had collected and who helped us form the vision and goals for CTE in Vermont. We validated our results by meeting with focus groups of CTE students and teachers in four randomly selected regions of the state.

The purpose of the vision and goals is to signal to the public and the public education system in Vermont what the priorities will be over the next decade. The purpose is also to provide

guideposts for any new legislation, initiatives, and any priorities undertaken in our Perkins state plan.

The State Board of Education endorsed this vision and goals on May 15, 2019:

Our vision for career technical education is that all Vermont learners attain their post-secondary goals by having access to career and technical education systems that are equitable, efficient, integrated and collaborative.

We will achieve this by working toward these aspirational goals. Each goal will have several strategies:

- Supporting only high-quality, rigorous, aligned CTE career pathway programs that are informed by available state, New England regional, and national labor market data.
- Engaging industry as a full partner in the creation, validation and maintenance of CTE programs.
- Developing and implementing career advisement systems that support career exploration and that allow all learners to be successful in pathways of interest.
- Supporting collaboration among systems and promoting coordination between systems as a means of ensuring equity and of providing students with a high-quality experience.
- Improving the public perception of CTE.

The State Workforce Development Board is currently in the process of developing a strategic vision and goals as part of updating the WIOA state plan. The current strategic vision is to “create a workforce development system that is a highly visible and accessible network of programs and strategies designed to increase employment, retention, and earnings for all Vermonters. This system will meet the skill requirements of employers, enhance the productivity, competitiveness and life circumstances for all Vermonters, and result in an improved, diverse, and quality economy.”

The guiding principles in administering this vision, and as applicable to post-secondary entities that receive Perkins funds are:

- The workforce system will support the workforce needs of all Vermonters, recognizing and addressing the unique needs of those with barriers to employment. The system will operate on the premise that any individual who wants to work, can work, given the right support.
- Employers will be both leaders and partners in the design, development and implementation of the workforce development system. The workforce development system must be sufficiently flexible and responsive to make the workforce needs of Vermont employers.
- Sustained employment is the only viable route out of poverty for low income Vermonters. Therefore, the workforce development system will support pathways that lead to and can exceed a livable wage (see Table 1).

- Partners within the workforce development system will rely on the best available labor market information when making policy decisions, in order to ensure that Vermonters are being placed in the best position possible to succeed in the Vermont economy.

**Table 1: 2018 State of Vermont livable wage calculations based on family type and location<sup>1</sup>**

Family Type	Urban	Rural
Single Person	\$18.09	\$15.79
Single Person, Shared Housing	\$14.82	\$12.98
Single Parent, One Child	\$30.43	\$25.11
Single Parent, Two Children	\$39.10	\$32.19
Two Adults, No Children	\$13.97	\$12.71
Two Adults, Two Children (one wage earner)	\$32.79	\$30.71
Two Adults, Two Children (two wage earners)	\$22.50	\$20.37

The goals in the WIOA state plan include:

Goal 1: Maximize equitable access to workforce development services through a seamless, coordinated delivery system that provides a quality, consistent experience for any jobseeker or Vermont employer.

Goal 2: Connect individuals to the training and supports they need to enter an occupation and progress on career pathways resulting in a livable wage.

Goal 3: Strengthen the Vermont economy by working with state and private partners to make data-driven changes that increase the number of women and other underrepresented

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<sup>1</sup> As of August 2018, the average of rural and urban, two adults, no children is \$13.34/hr.  
<https://ljfo.vermont.gov/assets/Subjects/Basic-Needs-Budgets/2c974b591b/2019-Basic-Needs-Budget-and-Livable-Wage-report-FINAL-1-15-2019-v2.pdf>

populations employed in the skilled trades, STEM fields, advanced manufacturing and other Vermont priority sectors.

Goal 4: Ensure all students who graduate from high school are able to pursue and complete post-secondary education, training, apprenticeships or career opportunities, with the education and skills necessary to keep Vermonters competitive in the economic sectors critical to the Vermont economy.

Goal 5: Align the workforce development system to the needs of employers, as well as job seekers, through systematic and ongoing engagement and partnership.

While both vision statements and the underlying goals and principles may seem disconnected, in reality, they are not. The vision statements are focused on helping people attain their career goals.

The collective goals across CTE, Perkins, Workforce Development, and WIOA, speak to:

1. Protecting vulnerable populations
2. Using labor market information to inform programming decisions
3. The critical role that industry plays in the systems
4. The absolute need for career counseling and advising for program participants
5. The need for counselors and others to know about and understand how to help people access programs
6. The need for collaboration and coordination to ensure all aspects of the education and workforce development systems function efficiently and equitably
7. The importance of visibility and promotion of the system and the programs that make up the system.

Refer to a crosswalk of vision and goals in Appendix C.

### **Specific Perkins Goals and Strategies**

1. By 2024, Vermont plans to use its Federal investments under Perkins 5 to achieve three high leverage goals. These goals will be achieved by paying special attention to special populations, at a minimum identified in the law, through continuous improvement in the comprehensive local needs assessment, student data, multi-tiered systems of support, and in improvement strategies related to the accountability system
2. Increase student aspirations and pathway participation to post-secondary education and training
3. Increase post-secondary program completion rates
4. Reduce student debt overall, but specifically reduce participation in courses and programs that don't matter in the job market

Our goals will be accomplished through these strategies:

1. Focus on career and academic counseling and advising through collaboration and coordination
  - a. As we consider career counseling and advising as part of a more comprehensive solution to career readiness, we must be aware of national research that suggests career counseling and advising at the middle school level is critically important: students are beginning to make decisions about themselves and their abilities that will affect the rest of their lives. Based on social and cultural pressures, students begin to develop a perception of what they can and can't do at this time based on perceived and real cultural limitations and biases. At the same time, there is a risk of disengagement. Young women, minorities, and at-risk students are particularly at risk of disengagement and in some cases of dropping out of school entirely.
    - i. Adults in formal and informal advising and counseling capacities need leadership, support, and professional development to recognize and manage their own biases, to be in better positions to help students and families challenge societal and cultural pressures, to understand the opportunities in the labor market and post-secondary education, and be able to meaningfully connect all the pieces, including to CTE, for students and their families.
  - b. Every school district serving students in grades 7-12 will have the opportunity to benefit directly or indirectly from Perkins in some way, though primarily through implementing comprehensive career guidance systems and career development activities operated through or in collaboration with the regional CTE system.
  - c. Ensure that every student has the opportunity to participate in and succeed in all aspects of a CTE program, including introductory programs should they choose to participate in one.
  - d. Increase opportunities for pre-technical and introductory course work
    - i. 20% of 9th and 10th graders will participate in introductory programs; 50% of those students will later enroll in 11th and 12th grade CTE programs.
    - ii. Vermont Virtual Learning Collaborative will be a resource for delivering introductory CTE programs to at least half of the regions of the state
2. Ensure the CTE teacher and leadership workforce is supported and prepared
  - a. CTE teachers will be better prepared through ongoing and annual professional development focused on ensuring they have the most up-to-date technical knowledge and skills in their industries.
  - b. CTE teachers and administrators will be better prepared through ongoing or annual professional development focused on supporting at-risk and vulnerable populations.
3. Ease and simplify transition points
  - a. Through quarterly Perkins coordinating meetings, there will be an increase in state-wide collaboration and coordination between CTE and post-secondary education.
  - b. We will develop criteria for recognizing secondary CTE programs as "pre-apprenticeship." Through promotion of these programs and their connections to

Registered Apprenticeship programs we will see an increase in participation for Registered Apprenticeships.

c. Work to ensure new opportunities for collaboration and coordination are explored and can be supported with Perkins or state funds, including the formation and support of consortia.

d. Ensure that dual/concurrent enrollment courses in CTE centers are accessible to students, regard of the qualifications of their teacher or the location of the CTE center.

4. Offer high quality, standards based CTE career pathways/programs of study that are aligned with high-skill, or high wage, or in-demand occupations

a. All CTE programs standards will be updated which will allow for equitable recognition of student experience regardless of their home high school. This will also allow for state-wide articulation agreements with post-secondary institutions.

b. Require state level articulation agreements to be in place for career pathways programs.

c. State Board of Education rules governing CTE in Vermont will be revised to be more reflective of other education and workforce development policies passed in the last five years.

**Demographic Context: Vermont by the Numbers**

Vermont’s census data shows a population estimate in 2019 of 623,989. This represents a contraction of -0.3% over the period of April 1, 2010 – July 1, 2019, as compared to the national population growth rate of 6.3%. Below is a table of select population statistics comparing Vermont to the rest of the nation (U. S. Census Bureau unless otherwise noted):

GENERAL POPULATION	Vermont	United States
Population estimates, July 1, 2019, (V2019)	623,989	328,239,523
Population estimates base, April 1, 2010, (V2019)	625,737	308,758,105
Population, % change - April 1, 2010 to July 1, 2019	-0.3%	6.3%
Female persons	50.6%	50.8%

RACE & HISPANIC ORIGIN	Vermont	United States
White alone	94.2%	76.5%
Black or African American alone	1.4%	13.4%

American Indian and Alaska Native alone	0.4%	1.3%
Asian alone	2.0%	5.9%
Native Hawaiian and Other Pacific Islander alone	--	0.2%
Two or More Races	2.0%	2.7%
Hispanic or Latino	2.0%	18.3%

AGE	Vermont	United States
Persons under 5 years, percent	4.7%	6.1%
Persons under 18 years, percent	18.5%	22.4%
Persons 65 years and over, percent	19.4%	16.0%

COMPUTER AND INTERNET USE	Vermont	United States
Households with a computer, percent, 2014-2018	88.9%	88.8%
Households with a broadband Internet subscription, percent, 2014-2018	80.2%	80.4%

EDUCATION	Vermont	United States
High school graduate or higher, percent of persons age 25 years+, '14- '18	92.6%	87.7%
Bachelor's degree or higher, percent of persons age 25 years+, '14- '18	37.3%	31.5%
Credential of Value Attainment (age 25-64)	50%	No data

Total Student Loan Debt	\$2.6 Billion	\$1.46 Trillion
Women's share of Student Loan Debt Burden (%)	--	65%
Graduating College Senior Average Student Debt Burden	\$31,431	\$29,200
Graduating College Seniors w/ Debt	63%	65%

HEALTH	Vermont	United States
With a disability, under age 65 years, percent, 2014-2018	10.5%	8.6%

ECONOMY	Vermont	United States
In civilian labor force, total, percent of population age 16 years+, '14- '18	65.7%	62.9%
In civilian labor force, female, percent of population age 16 years+, '14- '18	63.0%	58.2%

INCOME AND POVERTY	Vermont	United States
Median household income (in 2018 dollars), 2014-2018	\$60,076	\$60,293
Persons in poverty, percent	11.0%	11.8%
% of Women with income below \$30,000/yr.	57%	No data

### ***Vulnerable Populations: Women***

According to research and analysis conducted by Change the Story VT , the gender wage gap in Vermont is \$0.16; at the national level, it's \$0.18. Using median household income as a base, a woman would make \$60,076 per year while a man, performing the same work would make

\$9,612 more per year (60,076 \* \$0.16). Even more striking is the disparity of wages between women and men when race and color are examined with national data:

For every dollar a man makes on average:

- Black women make \$0.62.
- Hispanic women make \$0.54.
- Asian women make \$0.89.
- Native Hawaiian or Other Pacific Islander women make \$0.61.
- American Indian or Alaska native women make \$0.57.

In Vermont some additional statistics presented by Change the Story VT, remind us of our obligation to ensure that young women are placed on a path that will lead to economic viability for them and their families:

- Women and girls represent half of our population
- 51% of women are married and are more likely than men to be widowed
- Outside of married couples, Vermont widowed, divorced, separated, or never married women shoulder primary responsibility for the care of minor children
- 66% of adult women participate in Vermont's labor force, peaking between ages 22 -54
- Vermont women of all ages and levels of education occupy more of the low wage jobs<sup>2</sup>
- 57% of women have an income lower than \$30,000/yr. making them more likely to live in poverty than men.<sup>3</sup>
- VT women working in occupations historically filled by women, make less than their male counterparts in historically "male" occupations.<sup>4</sup>

### ***Vulnerable Populations: English Language Learners***

According to the U. S. Census 2018 American Community Survey 5-year survey, the majority (94.25%) of Vermonters speak only English. The remaining 5.75% speak another language as their primary language. Languages other than English spoken across the state is highly dependent on the location. The Migration Policy Institute identifies the top non-English primary languages at home as: Nepali (16.5% of English language learners), Cushitic, Spanish, and Chinese.

### ***Vulnerable Populations: Veterans***

Veterans are valuable contributors to Vermont's workforce. They bring valuable transferrable skill-sets from their military jobs to the private and public sector roles. According to data from the U. S. Department of Veterans Affairs , it is estimated that by September 30, 2020 there will

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<sup>2</sup> <https://changethestoryvt.org/visuals/>

<sup>3</sup> Ibid.

<sup>4</sup> Ibid.

be 19.726 veterans aged 18-64 (see additional statistics below). This statistic is particularly important for Vermont’s Perkins plan for two reasons:

1. A new special population for added attention at the secondary level is students whose parents are members of the armed services and who are on active duty, and
2. Veterans are a population that may need additional support and consideration at the post-secondary level as they attempt to transfer their experience and training in the military into articulated skill requirements for certificate and degree programs.

Veteran Population (as of 9/30/2017)	Vermont	United States
Number of Veterans	43,191	19,998,799
Percent of Adult Population that are Veterans	8.89%	6.60%
Number of Women Veterans	3,784	1,882,848
Percent of Women Veterans	8.76%	9.41%
Number of Military Retirees	3,904	2,156,647
Percent of Veterans that are Military Retirees	9.04%	10.78%
Number of Veterans Age 65 and Over	21,939	9,410,179

**Vulnerable Populations: Incarcerated Individuals**

**Vulnerable Populations: Unemployed**

In December 2019, the Vermont Department of Labor reported the following information about the unemployment rate:

*“The Vermont seasonally-adjusted unemployment rate increased [...] to a level of 2.3 percent. The comparable United States rate in November was 3.5 percent, which was a decrease of one-tenth of one-percentage point from the revised October estimate. The seasonally-adjusted Vermont data for November show the Vermont civilian labor force decreased by 1,269 from the prior month’s revised estimate. The number of employed persons decreased by 1,359 and the number of unemployed persons increased by 90. The changes to the labor force and the number of employed persons were statistically significant in the seasonally-adjusted series.*

*“The November [2019] unemployment rates for Vermont’s 17 labor market areas ranged from 1.7 percent in White River Junction to 3.6 percent in Derby (note: local labor market area*

*unemployment rates are not seasonally-adjusted). For comparison, the November unadjusted unemployment rate for Vermont was 2.2 percent, which was an increase of six-tenths of one percentage point from the revised unadjusted October level and a decrease of two-tenths of one percentage point from a year ago."*

### **Vulnerable Populations: Persons with a Disability**

Cornell University maintains national and state-level reports on the prevalence and relative economic status of people with disabilities. The most recent report available is from 2017. The statistics below are extracted from that report . The data reference the 2017 American Community Survey data from the U. S. Census Bureau.

#### **Employment**

- In 2017, the gap in the employment rates between working-age people with and without disabilities was: 35.6%:
  - the employment rate of working-age people with disabilities in VT was 45.9%
  - the employment rate of working-age people without disabilities in VT was 81.5%
- Of the six types of disabilities identified in the American Community Survey (ACS):
  - the highest employment rate, at 62%, was for people with a "Visual Disability"
  - the lowest employment rate, at 24%, was for people with a "Self-Care Disability"
- In 2017 in VT, the percentage of working-age people with disabilities who were not working but actively looking for work was 10.1%.
- In 2017 in VT, the percentage of working-age people without disabilities who were not working but actively looking for work was 13.1%.

#### **Wages**

- In 2017:
  - When a household includes a person with a disability, the median annual income of that household is slightly more than a third less (36.68%) less than the median income of a household that does not include a person with a disability.
    - median income of households that include any working-age people with disabilities in VT was \$41,600.
    - the median income of households that do not include any working-age people with disabilities in VT was \$65,700.

#### **Poverty**

- The poverty rate of working-age people in Vermont is significantly higher among individuals with a disability.
- In 2017:
  - the poverty rate of working-age people with disabilities in VT was 27.0%.
  - the poverty rate of working-age people without disabilities in VT was 9.4%.

## Educational Attainment

- Disability impacts people's level of educational attainment which ultimately affects their income over a lifetime:
- In 2017, in Vermont,
  - working-age people with only a high school diploma
    - with disabilities was 39.2%.
    - without disabilities was 29.6%.
  - working-age people with only some college or an Associate's degree
    - with disabilities was 26.9%.
    - without disabilities was 25.5%.
  - working-age people with a Bachelor's degree or more
    - with disabilities was 18.8 %.
    - without disabilities was 39.1%.

## Veterans

- In 2017, there were 16,000 working-age civilian veterans in VT, of whom 4,000 had a VA service-connected disability.
  - the percentage of working-age civilian veterans in VT with a VA service-connected disability was 25.3%.
  - 1,200 working-age civilian veterans in VT had the most severe service-connected disability rating (70 percent or above).

## Age

- In 2017, the prevalence of disability by age band in VT is represented in the following chart which shows the population over 65 makes up 70% of the population of individuals with a disability:

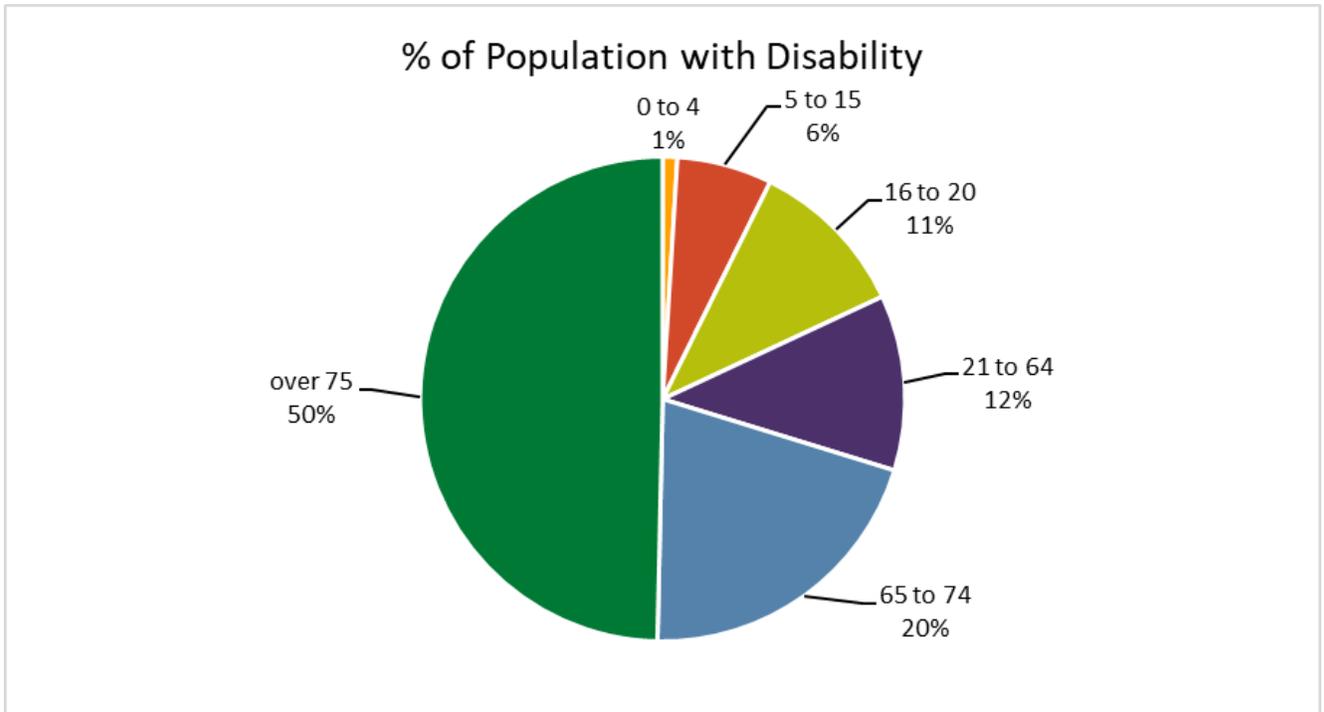


Table 3: Percentage of Population with a Disability by Age

Age Range	Percentage of Population
0 to 4	1%
5 to 15	6%
16 to 20	11%
21 to 64	12%
65 to 74	20%
Over 75	50%

### ***Aging Population***

According to the [Vermont’s State Plan on Aging](#):

“Vermont is currently the second oldest state in the nation with a median age of 43.1. In general, the reasons for Vermont’s ranking include low birth rates and low migration

rates coupled with an aging population that is living longer than past generations. According to the US Census Bureau, Vermont had a population in [2019 of 623,989, of which 19.4%] were age 65 or older.”

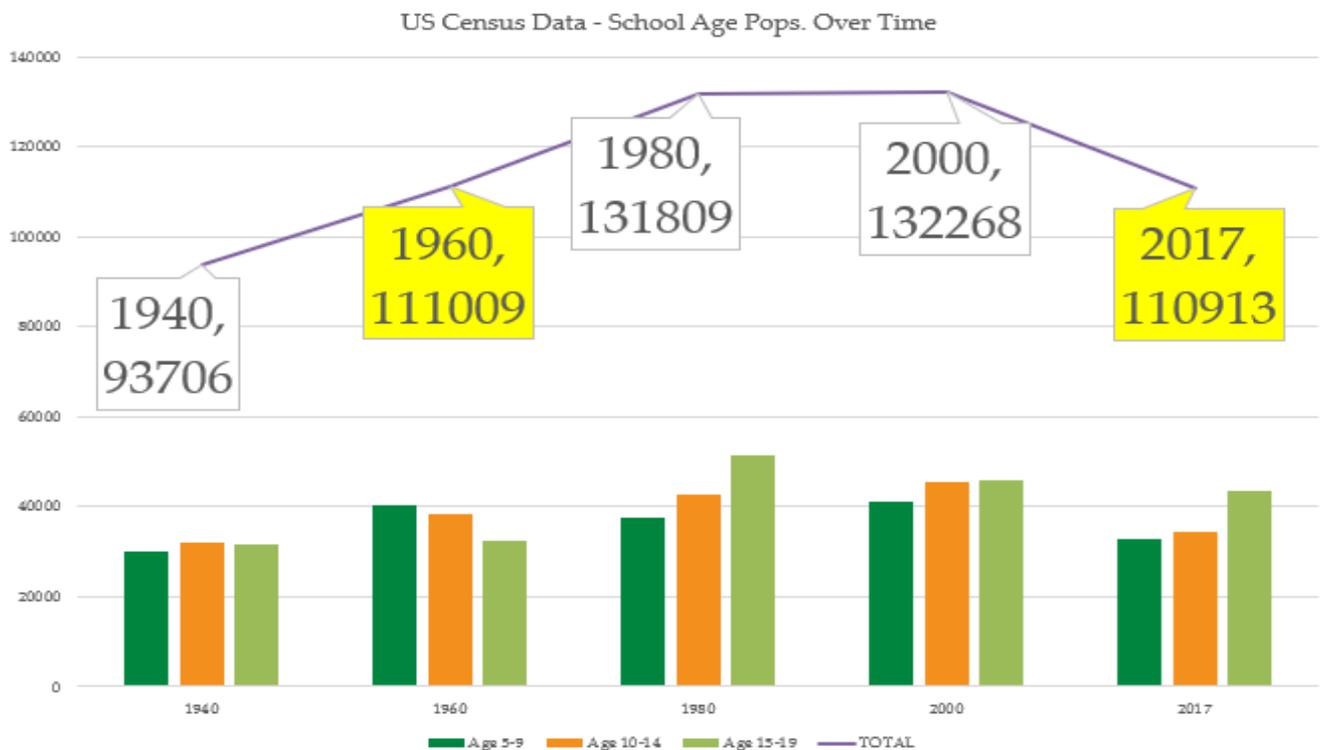
The State Plan on Aging goes on to point out the rest of the context and environment factors impacting older populations:

“[one] factor seriously impacting Vermont’s ability to meet the needs of our aging population is our workforce shortage. With a decreasing labor force and limited immigration, the lack of workers touches every sector at every level serving older Vermonters across the care continuum. Vermont lacks enough geriatricians and primary care providers, mental health clinicians, nurses, nursing aides, and personal care attendants to name a few. This was highlighted in the [statewide needs assessment report](#) and is brought up as a serious issue in almost every meeting in community.”

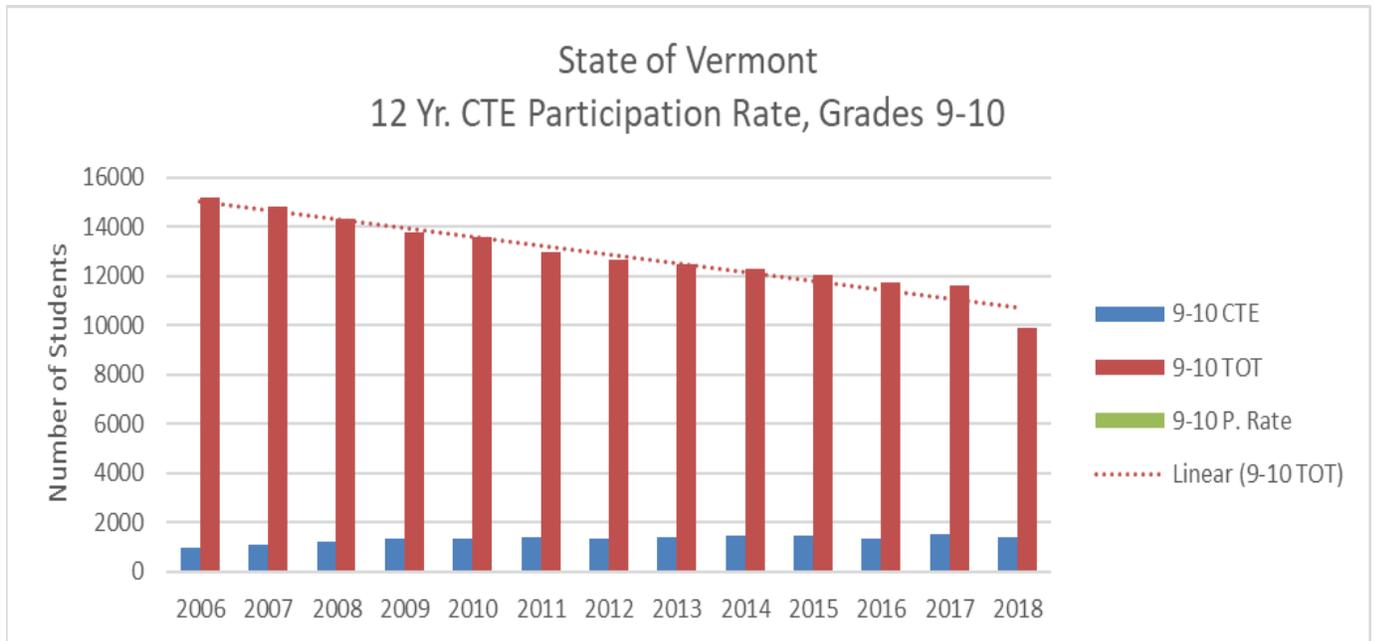
### **School Age Population & Enrollment**

As Vermont’s older population continues to grow, we see a shrinking school age population. The chart at right shows the changes in Vermont’s school age population since the 1940s. Vermont saw its highest school age population (ages 5-19) in the early 2000s. The chart also shows that our census estimates roughly the same population in the 1960s as is present in our school systems as recently as 2017.

Figure 1: Vermont's school-age population over 80 years

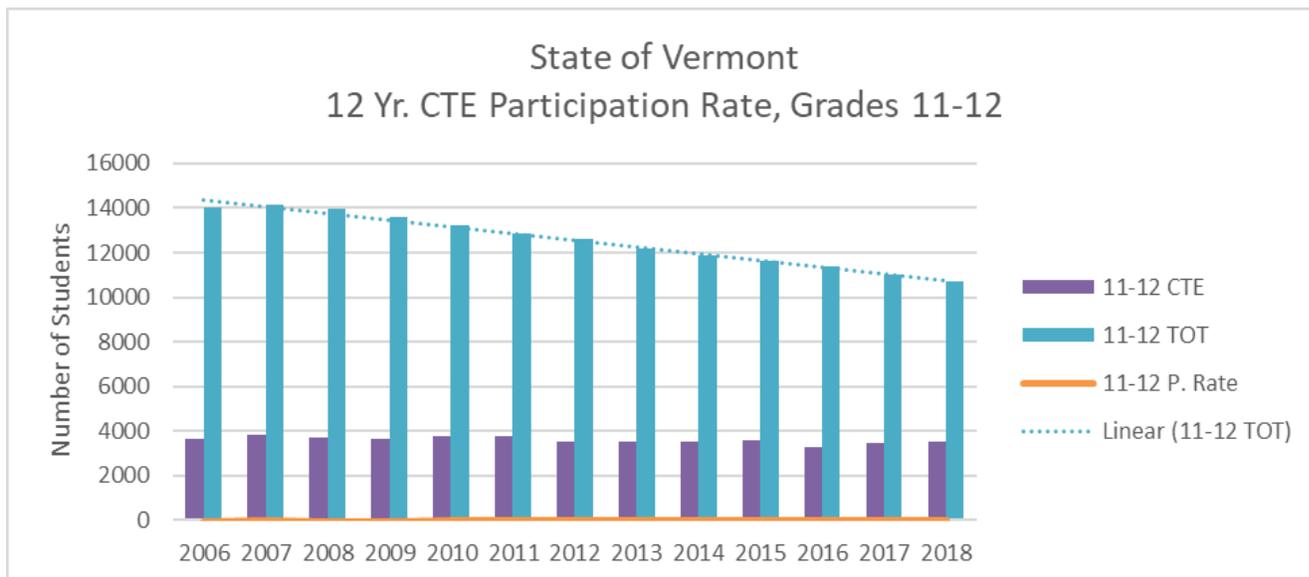


The charts on the next page show the participation rate of students by grade bands (9th/10th and 11th/12) in CTE. The taller bars represent the total enrollments across the state of students in the specified grades, while the shorter bars represent the total enrollments in CTE across the state of students in the specified grades. The reader will notice a decline over 12 years of the total student population in the state while at the same time students are participating in CTE at a higher rate over the 12-year period.



**State of Vermont 12 Year CTE Participation Rate, Grades 9 – 10**

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
9 – 10 CTE	962	1096	1246	1344	1352	1398	1356	1422	1473	1492	1348	1539	1412
9 – 10 TOT	15192	14808	14321	13751	13751	12980	12657	12505	12270	12056	11768	11618	9918
9 – 10 P. Rate	6.33%	7.40%	8.70%	9.77%	9.96%	10.77%	10.71%	11.37%	12.00%	12.38%	11.45%	13.25%	14.24%



**State of Vermont 12 Year CTE Participation Rate, Grades 11-12**

	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
11- 12 CTE	3641	3835	3710	3638	3786	3756	3536	3549	3549	3574	3305	3464	3523
11 – 12 TOT	14045	14166	13995	13624	13217	12840	12617	12159	11872	11617	11377	11006	10698
11 – 12 P. Rate	25.92%	27.07%	26.51%	26.70%	28.64%	29.25%	28.03%	29.19%	29.89%	30.77%	29.05%	31.47%	32.93%

At the post-secondary level, the Community College of Vermont (CCV) and Vermont Technical College (VTC) (entities that deliver post-secondary technical education and recipients of Perkins funds), report enrollments for fall 2019 of [5,539 \(CCV\)](#) and [1,621 \(VTC\)](#).

## **Required Narrative B: [1] State's Vision for Education and Workforce Development: [a] summarize state-supported workforce development activities**

### **Policy Ecosystem**

Since 2013, Vermont has been working to implement groundbreaking policies (Act 77) aimed at ensuring our students have personalized learning experiences and documented personalized learning plans (PLP) starting in grade 7. This law created a dual enrollment program for all publicly funded 11th and 12th grade students, expanded early college programs for Vermont's high school seniors, encouraged high schools to begin implementing work-based learning programs as part of PLPs, and included CTE as part of the flexible pathway framework. As this law was passed, the Vermont State Board of Education passed the "Education Quality Standards (EQS). The EQS provided the policy changes to move the state from a Carnegie Unit/seat time education system to one of proficiency-based learning and a requirement for updated graduation requirements in all school systems.

The EQS also provide the basis for the Vermont's accountability system under the Every Student Succeeds Act (ESSA) (2015). Vermont's state plan for ESSA represents a significant policy document that has the potential to change the way students, families, and the general education system views workforce preparation activities. The approved state plan's performance indicators include "college and career ready" measures that value, on equal footing, college ready assessments like ACT and SAT with career ready assessments like industry recognized credential tests. The accountability system also values, on equal footing, student outcomes ranging from college to trade school enrollment.

Over the course of the last four years, Vermont has been focused on improving our education and workforce development systems, and in improving the connections between workforce, education, and training providers, all in the interest of ensuring our students are college and career ready and prepared for the career pathways and opportunities available in Vermont.

In 2015, Act 51 required the Agency of Education, working with the Agency of Commerce and Community Development, the Department of Labor, and the Vermont State colleges to "convene, develop suggestions, and report on how Vermont's CTEs can be better utilized to provide training aligned with high-wage, high-skills, high-demand employment opportunities in Vermont...." [The report that resulted from this Act](#) summarizes a series of coordinated efforts among state agencies in the interest of both increased career technical center utilization and in advancing the career pathways/priority programs of study implementation model in Vermont. The report also provided a set of policy recommendations relating to entitlement, funding, governance, and implementation of career pathways/programs of study.

In 2017, Act 69 designated the Commissioner of Labor as the leader of workforce education and training in the state. It directed the Commissioner to work with the State Workforce

Development Board to assess Vermont's current system of workforce education, development, and training programs, to identify inefficiencies in the system and design and propose solutions to reimagine the system including certain elements related to expanding access to CTE. As official policy, this law defined career pathways for the state to include grade 7 and beyond. It directed the Agency of Education to provide technical assistance to school districts working to implement work-based learning programs as part of career development and the personalized learning planning process to help eliminate replication and duplication of efforts. The Act, and the approved budget provided authorization for the creation of the state's first career pathways coordinator. The position at the Agency of Education was created to develop [state-wide career pathways/programs of study](#) in priority sectors, a recommendation from Act 51. Oscar Aliaga, the career pathways coordinator is currently leading the state through employer dependent processes to develop a pathway in Computer Science/Cybersecurity, in Advanced Manufacturing, in Construction, and in Health Science.

In 2018, Act 189 authorized the Agency of Education to approve up to four pilot projects, proposed by regional CTE centers and their partner high schools, to examine a new funding formula or governance structures or both. It required the Agency of Education to report on the status of the pilots and to also make policy recommendations that would help expand offering of introductory CTE courses to 9th and 10th graders, and how to expand access to 7th and 8th grades. It focused workforce development efforts on expansion of apprenticeship and other work-based learning programs. The law authorized the State Workforce Development board to create a new committee on Career Pathways, and one on Training and Credentialing.

The board created a working group to determine the charge and membership of the new committee. Jay Ramsey, the state CTE director served as a co-chair of this working group that also proposed a definition of credential of value to the State Workforce Development Board. Mr. Ramsey also serves on the newly formed committee. The Vermont Department of Labor and Vocational Rehabilitation have been leading efforts in the state to increase understanding of credentials of value/industry recognized credentials to help inform future policies. Doug Webster, CTE Coordinator at the Agency and a representative from the Agency's Adult Education and Family Literacy team are both participating with other state government partners in credential attainment cohort training offered by the Employment and Training Administration from the U. S. Department of Labor.

In 2019, Act 80 directed the Commissioner of Labor to hire an outside consultant to study the universe of post-secondary CTE in the state and to make recommendations for how to improve its efficiency and equity of availability across the state. The law also authorized \$200,000 to Vermont Technical College to study the feasibility of, and to design and begin to offer an early Associate's degree program for students in CTE programs. The goal was to have a high school senior complete the first year of the program and then finish the second year after they graduate high school. The law also set a 70% attainment goal for credentials of value.

## State Supported Activities

Annually, the Legislature allocates \$750,000 in state funds to support grants for improving secondary CTE. The Technology, Innovation, Modernization, and Equipment (T. I. M. E.) grant program is a competitive grant program available to all regional CTE centers and two comprehensive high schools across the state. The program is intended to support equipment purchases, and any activity that helps achieve the strategic vision, especially activities focused on supporting the systemic implementation of career guidance and counseling for students starting not later than 7th grade. Projects funded in the 2019-2020 school year included implementing satellite introductory courses, purchasing equipment and technology upgrades related to a state-wide career pathway/program of study in advanced manufacturing and in cybersecurity, and designing and implement an HVAC-R module for a high school construction technology program.

Over the last two school years, as a means of supporting the implementation and expansion of rigorous and [meaningful standards](#) -based work-based learning programs across the state, the Agency of Education provided an ongoing professional learning series for work-based learning coordinators.

Since the creation of the dual and concurrent enrollment program in 2013, [Vermont annually contributes approximately \\$1.7 million](#) to fund the program which provides all public high school juniors and seniors with two college course vouchers to be used while students are still in high school. The state also funds an early college program with a budget of approximately \$2.6 million, which includes the budgeted amount for the Vermont Academy of Science and Technology (VAST).

As mentioned in the previous section, the Legislature and Governor have authorized funding for a full-time career pathways coordinator position at the Agency of Education that works on the CTE team. The Legislature and Governor supported providing \$200,000 to Vermont Technical College to study the feasibility of an early Associate's program for CTE students.

In the last two years, the Vermont Department of Labor developed, and [published labor market information analysis](#) organized by CTE region. Also, the Department of Labor and the J. Warren & Lois McClure Foundation collaborated to create a "[Pathways to Promising Careers](#)" brochure that is used widely in schools across the state. Both documents are source documents that applicants are encouraged to reference in their Comprehensive Local Needs Assessments.

The Vermont Department of Labor, and the State Workforce Development Board working with regional development corporations hosted a series of regional workforce summits in the fall of 2019. The summits were a goal of the W. I. O. A. state plan but also served the purpose of starting structured conversations between employers, educators, and training providers. 2019 was the kick-off year for these events which are planned to continue into the near future.

Applicants for the Perkins funds are strongly encouraged to reference the results of these summits in their Comprehensive Local Needs Assessments.

**Required Narrative B: [1] State's Vision for Education and Workforce Development: [c] strategy for any joint planning, alignment, coordination, and leveraging of funds**

As a small state, Vermont enjoys the benefit of having a condensed stable of individuals working in education and workforce development. As evidenced by the summary of recent laws passed, the Legislature expects and requires a level of collaboration and coordination in state-level education and workforce development planning efforts.

Deputy Secretary of Education serves on the State Workforce Development Board with the Commissioner of Labor, the Commissioner of the Department of Corrections, the Director of Vocational Rehabilitation, the Commissioner of the Department of Economic Development, the Secretary of Commerce and Community Development, and the Presidents of the Community College of Vermont and Vermont Tech.

The State CTE Director serves on the State Apprenticeship Council, the state's apprenticeship expansion committee, serves on the Training and Credentialing Committee of the State Workforce Development Board, and is part of the grant review process for workforce development grants from both the Department of Labor and the Department of Economic Development.

Together, we formally and informally share strategies and actively seek out opportunities to plan, collaborate, coordinate, and align our initiatives.

**3. Collaboration and Coordination: State Planning**

**Required Narrative A: [1] Plan Development and Consultation: describe how it was developed in consultation with stakeholders**

As mentioned previously, in anticipation of Congress passing a reauthorized version of Perkins in the near future, the Agency of Education (AOE) engaged in a six month long multi-phase process to involve the public and interested stakeholders in developing a strategic vision and aspirational goals for career technical education (CTE) in Vermont. We conducted interviews of a cross-section of people including students, parents, CTE administrators, school administrators, industry representatives, workforce development partners, and policy makers; we ran a fifty question online survey over a three week period with more than 40% of the responses from students and families; and we held an all-day in-person meeting with a broad group of stakeholders who helped us interpret the data we had collected and who helped us form the vision and goals for CTE in Vermont. We validated our results by meeting with focus groups of CTE students and teachers in four randomly selected regions of the state.

During the late spring and summer of 2019, the Agency formed four working groups: secondary CTE, post-secondary CTE, joint secondary-post-secondary CTE, and comprehensive

local needs assessment. The post-secondary CTE working group met more frequently because there was an opportunity to better define post-secondary CTE in this Perkins plan than in our last Perkins plan. The Department of Labor and Vermont Student Assistance Corporation participated in the post-secondary meetings.

The Agency frequently meets with secondary CTE teachers and administrators which decrease the need for intensive consultation on this plan. The group that advised on the comprehensive local needs assessment was a cross-section of secondary and post-secondary educators, non-profits, and regional development corporations to help us design the process and content for the assessment.

We conducted statewide surveys of special populations coordinators, CTE counseling coordinators, and adult CTE providers to develop a better understanding of the special populations they served, the needs of those students, and the professional development needs of the CTE program teachers. We also used the survey to develop a better understanding of special populations data collection protocols within the CTE system that we are using to inform how we train and support administrators and data coordinators across the state.

We convened the data coordinators for the post-secondary entities that were likely to receive funds to develop better and consistent operational definitions for all indicators and all special populations.

We consulted with a number of members of the State Workforce Development. The Governor, via the Deputy Secretary of Education, was consulted at multiple times throughout the development process and made decisions about the accountability system and the budget.

All in all, 372 individuals, many of whom were teachers, were involved in the process of developing our state plan.

Refer to the Appendix section to see a full account of who participated in the process.

**Required Narrative A: [2] Plan Development and Consultation: describe how it was developed in consultation with other State agencies (VSC)**

Vermont State Colleges, in particular Community College of Vermont and Vermont Tech, participated in the post-secondary working group over the summer. We also had some participation from the University of Vermont. The State CTE Director met with staff from the Vermont State College's Chancellor's Office, and the presidents of both colleges on an on-going basis to discuss the direction of the state plan and to create an open line of communication regarding any concern the college may have about the plan.

Agency staff met formally and informally with the Director of Workforce Development at the Department of Labor.

The State CTE Director gave a presentation to the full membership of the State Workforce Development Board and gave opportunity for questions and input. Individual members of the board were met with or involved in the process through the summer and into fall of 2019.

**Required Narrative B: [4] Preparing Teachers & Faculty: describe how the agency will support recruitment and preparation of teachers (et. Al) to provide CTE instruction, leadership, and support, including PD that provides the knowledge and skills needed to work with and improve instruction for special populations.**

A driving factor that will determine professional development strategies is derived from the conclusion of the Comprehensive Needs Assessment, requirements under section D state:

“a description of how the eligible recipient will improve recruitment, retention and training of career and technical education teachers, faculty, specialized instructional counselors, including individuals in groups underrepresented in such professions.”

The General Authority provision of Perkins V State Leadership Activities requires activities to improve career and technical education which shall include support for recruitment, preparing, or retaining career and technical education teachers, faculty, specialized instructional support personnel, or paraprofessionals, such as pre-service, professional development, or leadership development programs.

As well, state leadership activities may include high quality professional development for teachers, faculty, specialized instructional support personnel, and paraprofessionals providing career and technical education instruction, support services.

As defined by the Comprehensive Local Needs Assessment findings professional development, funded through Perkins may include (not an exhaustive list, however professional development funded under Perkins must meet the definition of professional development provided in the law):

- individualized academic and technical education instructional approaches including integration of standards and curricula,
- ways to inform programs, guidance, parents and students labor market and economic needs information,
- opportunities and understanding of all aspects of industry especially the latest equipment, technologies, skill standards and credentials required and useful,
- supporting school leaders and administrators in administering career and technical education,
- support strategies that increase student participation and achievement, in career and technical education,
- support of personnel in providing appropriate accommodations to individuals with disabilities,
- providing frameworks for personnel to effectively teach students, and train for the effective use of community, museum, library and school based maker-spaces that provide access to equipment, tools, technology, teacher and student credentials, and support entrepreneurship practices.

Consequently, several approaches will be used to determine professional development strategies, including:

1. Inclusion of professional development needs assessment as part of the Comprehensive Local Needs Assessment. This template will include but is not limited to the following:
  - a. Self-assessment of professional development needs;
  - b. Leadership assessment of guidance, teacher, paraprofessionals, and support staff professional development needs;
  - c. Synthesis of Comprehensive Local Needs Assessment findings where professional development is needed and can help to close any outstanding gaps in student performance, program size scope and quality deficiencies, alignment to labor market and economic needs, gaps in program of study development, and access and supports for special populations;
  - d. Human resources and center/college leadership assessment of gaps in instructor availability comparing supply and demand across program areas and identification competitive wage targets for positions in low supply;
  - e. Leadership assessment of employee turnover rates and causes, wellness and satisfaction status, and ways to improve retention of personnel.
2. Expansion of the Career Cluster teacher professional learning communities (PLC) that are already established. These PLC groups currently meet twice annually and are facilitated by professional development staff funded and supported by Perkins via the Vermont Association of Career and Technical Education Directors (VACTED). Specific activities will include the following:
  - a. Synthesis of Comprehensive Local Needs Assessment data and information sorted by career cluster/PLC to identify specific gaps and common areas of need within the career cluster/PLC groupings;
  - b. Updating content standards and related curriculum work to begin organizing CTE programs into courses or modules, and developing curricular alignment opportunities with high schools;
  - c. Strategies developed by the career cluster/PLC to address the identified needs and gaps that include the following under Perkins V Required Uses: career exploration and development, skill standards and credential identification necessary to align with high skill, high wage, or high need industry sectors, occupations, and opportunities including entrepreneurship; support of integration of academics in career and technical education; expansion of program of study development to ensure all elements are adequate, support of evaluation processes to determine effectiveness of strategies, and as a PLC, identification of professional development needed to maximize effectiveness of the PLC itself;
  - d. Identify strategies that will help to recruit and retain personnel, particularly instructors within the respective career cluster/PLC that can be recommended to

center/college leadership and HR and inform the re-establishment of the statewide career and technical education state conference and association.

3. Establish statewide comprehensive professional development organizing committee that will synthesize Comprehensive Needs Assessment data and information to determine statewide professional development opportunities.

General audiences will include:

- a. Guidance – eligible recipient, middle, junior and high schools;
- b. Special populations coordinators;
- c. Career and technical education staff including directors, assistant directors, adult technical education directors and coordinators;
- d. Paraprofessionals
- e. Eligible recipient advisory boards and program advisory boards;

Focal areas may include:

- f. Individualized academic and technical education instructional approaches including integration of standards and curricula,
  - g. ways to inform programs, guidance, parents and students labor market and economic needs information,
  - h. opportunities and understanding of all aspects of industry especially the latest equipment, technologies, skill standards and credentials required and useful,
  - i. supporting school leaders and administrators in administering career and technical education,
  - j. support strategies that increase student participation and achievement, in career and technical education,
  - k. support of personnel in providing appropriate accommodations to individuals with disabilities,
  - l. providing frameworks for personnel to effectively teach students,
  - m. train for the effective use of community, museum, library and school based maker-spaces that provide access to equipment, tools, technology, teacher and student credentials, and support entrepreneurship practices.
4. Re-establish the Vermont Association of Career and Technical Education as a statewide networking and learning community. The following activities will take place over the course of the 4-year plan:
    - a. A statewide career and technical education 2-day conference will be held beginning at the latest in summer 2021, in order to serve all staff and faculty at career and technical centers and related career and technical education personnel from participating eligible postsecondary institutions.
    - b. The conference will serve three Perkins V requirements: 1) increase retention, 2) improve recruitment capabilities, and 3) provide professional development as

identified by Comprehensive Needs Assessment, regional professional development surveys, and career cluster/PLC discoveries.

- i. Retention – the August 2020 kick off conference will be the first statewide CTE conference in several years. Preliminary findings told us that teachers need an event to allow them to feel they are part of something big, that their work in career and technical education is important, and they are not alone in their challenges to make a difference for students and the greater community;
  - ii. Recruitment – by providing a forum for staff and faculty to celebrate career and technical education in Vermont, we plan to exploit the value proposition career and technical education offers via social media, general media, and education networks to instill demand among industry, college student, and general education to increase demand for working in career and technical education, particularly teaching;
  - iii. Professional Development – include professional development offerings that are aligned to previously identified assessments, surveys and PLC discoveries.
- c. Re-establish the ACTE Vermont membership, networks, and on-going communications, professional development continuums, and planning for an annual conference/event each August over the four-year grant cycle.

### **Required Narrative A: [3] Opportunities for public comment in person and in writing**

Perkins V requires a public comment period of not less than 30 days. The public comment period for Vermont’s draft Perkins V state plan is anticipated to be: Wednesday, Jan. 22, 2020, to Friday, Feb. 21, 2020 at 4:30 p.m. Information will be posted on the AOE website, in the weekly field memo, and in the monthly workforce newsletter. Public hearings will be held in four regions of the state and warned in newspapers in surrounding communities:

- North Country Career Center, Community Room, 209 Veterans Ave, Newport, VT 05855  
January 23, 2020 6:30pm – 8:00pm  
Snow date: February 2, 2020, same time
- Howard Dead Education Center, Atrium, 307 South St, Springfield, VT 05156  
January 27, 2020 6:00pm – 8:00pm  
Snow date: February 5, 2020, same time
- Bellows Free Academy, Performing Arts Center, 71 South Main St, St. Albans, VT 05478  
January 28, 2020 6:00pm – 8:00pm  
Snow date: February 4, 2020, same time
- Central Vermont Career Center, Conference Room 136, 155 Ayers St, Barre VT 05641  
January 30, 2020 6:00pm – 8:00pm  
Snow date: February 6, 2020, same time

VSC Objections and AOE response – In Appendix

#### **4. Purpose & Intent (and Implementation)**

##### **Required Narrative B: [2] Implementing CTE Programs/of Study: [d] describe how the agency will include dual or concurrent enrollment**

Under existing Vermont law, all high school juniors and seniors, including those students in CTE, have access to state-funded vouchers for dual and concurrent enrollment courses. Vermont also makes available funds to support early college programs for high school seniors that allow students to substitute their final year of high school with a full freshman year of college courses on an in-state college campus. Our efforts in the program year will be to align and crosswalk dual/concurrent offerings to our state-level career pathways initiatives.

##### **Required Narrative B: [2] Implementing CTE Programs/of Study: [a] describe CTE programs/of study that will be supported, developed, or improved at the state level**

In the process of developing our strategic vision and goals, we confirmed that students, families, and teachers need to have information about state-wide programs of study to help them accelerate their progress along a path to a career, to have a better understanding of in- and out- of state options, and ultimately to have everyone make informed decisions, particularly those that relate to student loan debt and the financial security of all Vermonters.

In the last two years, Vermont has assigned a number of resources to our development of career pathways; the key resource is the addition of a state funded Career Pathways Coordinator position to the Agency of Education's CTE team. This position play a key statewide role in convening relevant parties to agree on curriculum and deliver models, and to support the local implementation of state-wide programs of study by expanding CTE offerings into grades 7 and 8, assisting in the development of programming for 9th and 10th graders, and by ensuring rigorous, connected programming for 11th and 12th graders that is articulated to post-secondary education and training opportunities. The work of the Career Pathways Coordinator is informed by business and industry needs and available labor market information and closely links to the work of WIOA partners.

As identified in Vermont's WIOA State Plan, in alignment with our Strategic Goal to only support high-quality, rigorous, programs that are informed by available labor market data, the Agency of Education, working in partnership with regional technical centers, middle and high schools, employers, and post-secondary entities is developing, implementing, modifying, and sustaining career pathways programs of study in Construction Trades, Advanced Manufacturing and Information Assurance/Cybersecurity.

Vermont's state construction industry collaborative recently endorsed the core curriculum from the National Center for Construction Education and Research (NCCER) – every regional CTE center must offer this curriculum and resulting credential as part of their program of study. Our next steps will be to develop a formal credit transfer agreement with one of our eligible institutions and post-secondary programs and to begin to work to expand offerings to 7th grade

as well as increase student interest in and family support of studies in other construction trades such as electrical, plumbing, HVAC-R, and masonry.

By the beginning of the 2020-2021 school year we will have implemented, with our CTE partners, a state-wide cybersecurity program that uses the National Initiative for Cybersecurity Education-Research Center curriculum that requires a broader implementation of employability/transferrable skills curricula, and STEM and computer science curricula across the state, and that is coordinated with our regional CTE centers. We will also begin implementing, with our CTE partners, a manufacturing program. We will likely focus efforts on implementing these curricula in both middle grades and in introductory 9th and 10th grade courses.

There are several systems, not currently in place consistently across the state, that are necessary to sustain the implementation of these programs of study. Key component one, identified as a strategic goal, is to develop and implement career advisement systems that support career exploration and that allow all learners to be successful in pathways of interest. We also see the need to focus on development of math skills early on as part of the career pathways initiatives. We are interested in providing cross-disciplinary professional development for teachers, particularly those in middle grades with their colleagues in CTE. Other state-level initiatives that provide additional support to the development of these programs of study include adding CTE components to 7th and 8th grades, as well as expanding the implementation of introductory programs for 9th and 10th graders.

### **CLNA Process**

Vermont's Comprehensive Local Needs Assessment (CLNA) will largely be completed by eligible recipients either individually or in collaboration between secondary career and technical centers and/or postsecondary institutions in proximity. While the first round of CLNA may not have performance and quality thresholds established in all areas, the Agency of Education will lead conversations to establish, define, and quantify these criteria throughout the four-year grant cycle. This memo describes the new requirements under Perkins V, phases in the development and implementation of these new requirements, and processes to be used that will ultimately determine the allocation of resources to close gaps in performance across regional areas.

The Comprehensive Local Needs Assessment should be considered in the broader context of continuous improvement. The Agency of Education has made resources available to all schools around the state related to continuous improvement.

Per Section 134 (b) of the law, "the eligible agency shall determine the requirements for local application, except that each local application shall contain a description of the results of the comprehensive needs assessment conducted which states the following:

To be eligible to receive financial assistance, an eligible recipient shall conduct a comprehensive local needs assessment related to career and technical education and include the results of the needs assessment in the local application. The comprehensive local needs assessment shall include each of the following:

- a. An **evaluation of the performance of the students** served by the eligible recipient with respect to State determined and *local levels of performance established*;
- b. A **description of how career and technical education programs** offered by the eligible recipient are –
  - *Sufficient in size, scope, and quality (see Purpose & Intent section)* to meet the needs of all students served by the eligible recipient; and
  - *Aligned to State, regional, Tribal, or local in-demand industry sectors or occupations* identified by the State workforce development board described in section 101 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3111) (referred to in the section as the ‘State board’ or local workforce development board, including career pathways were appropriate; or
  - *Designed to meet local education or economic needs* not identified by State boards or local workforce development boards.
- c. An **evaluation of progress** toward the implementation of career and technical education **programs and programs of study**;
- d. A **description** of how the eligible recipient will *improve recruitment*, retention, and training of career and technical education teachers, faculty, specialized instructional support personnel, paraprofessionals, and career guidance and academic counselors, including individuals in groups underrepresented in such professions;
- e. A **description of progress** toward implementation of *equal access* to high-quality career and technical education courses and programs of study for all students, including –
  - **Describe strategies to overcome barriers** that result in lower rates of access to, or performance gaps in, *the courses and programs for special populations*;
  - **Providing programs that are designed to enable special populations** to meet the local levels of performance; and
  - **Providing activities to prepare special populations** for *high-skill, high-wage, or in-demand industry sectors or occupations* in competitive, integrated settings that will lead to self-sufficiency.

For the purpose of clarity, the six required assessment areas in the Comprehensive Local Needs Assessment are identified as follows in this document:

- I. Student Performance
- II. Labor Market Need
- III. Program Implementation
- IV. Progress Toward Implementing Programs of Study

- V. Recruitment, Retention and Training of CTE Educators
- VI. Progress Toward Improving Equity and Access

### ***Who must be included in the assessment?***

The following individuals and organizations must be consulted in determining local needs, performance gaps and options for corrective action to address performance gaps. Each of the six required areas to be assessed suggests positions and organizations that would be best suited for consultation.

- Representatives of career and technical education programs in a local educational agency or educational service agency, including **teachers, career guidance and academic counselors, principals and other school leaders, administrators, and specialized instructional support personnel and paraprofessionals;**
- Representatives of career and technical education programs at postsecondary educational institutions, **including faculty and administrators;**
- Representatives of the **State Board or local workforce development boards and a range of local or regional businesses or industries;**
- **Parents and students;**
- Representatives of **special populations;**
- Representatives of regional or local agencies serving **out-of-school youth, homeless children and youth, and at-risk youth;**
- Representatives of **Indian Tribes and Tribal organizations** in the State, where applicable;
- And any other stakeholders the eligible recipient may deem necessary to consult.

### ***Three Phases of Vermont's Comprehensive Needs Assessment***

While the CNA will include the six required areas, assessments of each area should progress in three phases or steps:

1. **Needs Analysis** – determining needs by understanding target, quality, and performance thresholds to meet standards;
2. **Gap Analysis** -- measuring, assessing, and analyzing what the current state of performance, output and capacity is within the subject region; and finally,
3. **Local Plan Development** – identifying and prioritizing strategies that will address the performance gaps to meet standards.

As an example:

1. **Needs Analysis** – what are the high demand, high skill or high wage areas? What are the emerging economic needs within the community? What programs do parents and students find of most interest? What are the key elements that define quality programming, career exploration and awareness, work-based learning, access, etc.

2. **Gap Analysis** – how well does the current center programming align with identified high skill, high wage, high skill areas, economic opportunities, emerging technologies, student demand, quality programing, access, career exploration and awareness, work-based learning?
3. **Local Plan Development** – what strategies and resources will be required within the region to adequately address the gaps identified in the CNA by both the CTE centers and eligible colleges within the region? This will be what makes up each CTE center and college four-year Local Plan.

### **Needs Assessment Rubric**

The following rubric describes the six required areas to be assessed and provides a list of materials to be reviewed, persons and organizations to be consulted, and questions that should be asked. While the collection of information is important, acceptable levels of performance needs to be established along the way to determine if and at what level Perkins V funds should be applied. At present, many areas lack even suggested definitions of quality and performance thresholds. For example, what does quality, adequate access, and equity to Career Exploration activities look like across a region? How do you define it? For this reason, each eligible recipient should attempt to follow the three-step process outlined above to determine what constitutes quality; determine the gaps in programming at their respective institution or center; and be able to prioritize allocation of resources to help close identified gaps over a four-year period.

NOTE: while most CNA required areas are geared toward secondary CTE, postsecondary CTE need only process areas that apply to postsecondary.

### **2020 Comprehensive Needs Assessment Perkins V Application Instructions**

- A. For each LNA area, read each question and provide evidence of your answers
- B. Based on the evidence, assign a score for each required area;
- C. Provide a description of why you chose that particular score;
- D. For areas assigned a score of 2 or lower, provide a description of how you plan to address/improve that area.

### **Required Narrative C: [8] if reserve funds will be awarded, describe the process and criteria**

Vermont will have separate reserve funds for secondary and post-secondary programs, with a 50%/50% split in the reserve amount.

We will award funds under section 112(c) using a competitive application process. The use of funds will be focused on access and success for post-secondary opportunities.

Nearly all secondary recipients are in rural areas and granting of funds will focus on supporting the development, implementation, and/or adoption of career pathways/programs of study in

high-skill, high-wage, or in-demand occupations. Our model for career pathways, and one of our strategic goals, includes a focus on systemic implementation of career guidance and counseling for students starting not later than 7th grade. We expect these reserve funds will support broad, collaborative implementation of career guidance and counseling. In order to grant funds in this manner, we will require each applicant to demonstrate a willingness and commitment on the part of their partner sending high schools to have a technical center staff person work in their building in order to have access to the tools, resources, and other investments made possible through the Perkins Reserve grant.

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 developed to align with career pathways and programs of study that lead to high-skill, high-wage, or in-demand occupations

The reserve 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, partners identified the priority of updated post-secondary curriculum and delivery, and the priority of ensuring vulnerable populations and historically disadvantaged/marginalized students can access dual/concurrent offerings. The criteria and process for granting of “reserve” funds are discussed in the “Purpose & Intent” section.

The reserve funds for secondary are supplementary to \$750,000 in state funds allocated by Vermont’s legislature for the Technology, Innovation, Modernization, and Equipment (T. I. M. E) grant program.

**Required Narrative B: [1] State's Vision for Education and Workforce Development:  
[d] Describe how leadership funds are made available and in alignment with section 124**

Leadership funds are made available through grants or through contracts, both administered according to the State of Vermont Agency of Administrations guidelines and procedures. The majority of funds are used to for salary, benefits, and travel related expenses of Agency staff who provide leadership for certain areas of the Perkins program.

**5. Accountability**

**Required Narrative D: [1] Identify and include at least 1 program quality indicator (RPC), include any other measure of student success**

See below form

**Required Narrative D: [1] provide eligible agency's measurement definition with numerator and denominator for each quality indicator selected**

**Measurement definitions, Secondary:**

Code	Indicator	Numerator	Denominator	Rules/comments
1S1	Graduation Rate: Four Year	CTE concentrators who were part of the graduating cohort who graduated	CTE Concentrators who were part of the 4-year graduation cohort	Non-diploma 10 <sup>th</sup> , 11 <sup>th</sup> , or 12 <sup>th</sup> grade students, at Perkins approved CTE centers (Miss), who are concentrators
1S2	Graduation Rate: Extended*  <i>This indicator is new under ESSA; there are currently no available data from which to establish a baseline</i>	CTE concentrators who were part of the extended cohort who graduated	CTE concentrators who were part of the extended graduation cohort	Same as above
2S1	Academic Proficiency: Reading/Language Arts	CTE Concentrators' highest score (Silver or Above) on WorkKeys Workplace Documents	CTE concentrators who took the WorkKeys Workplace Documents assessment	Same as above  Assessment offered at beginning of program, and end of program for one-year programs; and at end of first year for two-year programs.  Reported every year they are a concentrator until they graduate
2S2	Academic Proficiency:	CTE Concentrators' highest score	CTE concentrators who took the WorkKeys Applied	Assessment offered at beginning of program, and end of program for

	Mathematics (Applied Mathematics)	(Silver or Above) in the WorkKeys Applied Mathematics	Mathematics assessment	one-year programs; and at end of first year for two-year programs.  Same as above  Reported every year they are a concentrator until they graduate
<b>2S3</b>	Academic Proficiency: Science	CTE Concentrators who scored proficient on the Next Generation Science Standards assessment	CTE concentrators who took the Next Generation Science Standards assessment	Assessment taken in 11 <sup>th</sup> grade.
<b>3S1</b>	6 Month Post-Program Placement	CTE concentrators, who in the 2 <sup>nd</sup> quarter after finishing a CTE program, were placed	CTE concentrators who exited the CTE program the previous academic year	Same as above
<b>4S1</b>	Non-Traditional Program Concentration	CTE concentrators enrolled in programs leading to a non-traditional field for their gender	All CTE concentrators enrolled	Same
<b>5S1</b>	Program Quality: Recognized Post-secondary Credential Attainment	CTE Concentrators who are graduating (and who have successfully	CTE concentrators who graduated or exited program in the reporting year.	Same

		completed a CTE program?), who have earned a recognized postsecondary credential at the time of graduation		
<b>VT-5S1a</b>	Attained Postsecondary Credits	CTE Concentrators who are graduating (and who have successfully completed a CTE program?), who either in their 11th or 12th grade years were reported as having passed a dual or concurrent enrollment course.	CTE concentrators who graduated or exited program in the reporting year.	Same
<b>VT-5S1b</b>	Participation in Work-Based Learning	CTE concentrators who are graduating (and who have successfully completed a CTE program?) who have participated in a qualifying (?)	CTE concentrators who graduated or exited program in the reporting year.	Same

		Work-Based Learning		
<b>VT-S1</b>	Introductory course participation rate	Number of 9-10 <sup>th</sup> grade students who are participating in Career and Technical Education	Number of available 9-10 <sup>th</sup> grade students	Non-diploma students at Perkins approved CTE centers
<b>VT-S2</b>	Continuation rate	CTE participants enrolled in a non-introductory courses in the reporting year who took a pre-tech course any time in the previous 3 school years	All CTE participants enrolled in non-introductory courses in the reporting year.	
<b>VT-S3</b>	Program participation rate	Number of 11-12 <sup>th</sup> grade students who are participating in Career and Technical Education	Number of available 11-12 <sup>th</sup> grade students	Non-diploma students at Perkins approved CTE centers
<b>VT-2S1</b>	ELA Assessment Participation Rate	CTE concentrators who took WorkKeys Workplace Documents	All CTE concentrators in the reporting year	Non-diploma students at Perkins approved CTE centers who are concentrators
<b>VT-2S2</b>	Mathematics Participation Rate	CTE concentrators who took WorkKeys	All CTE concentrators in the reporting year	Non-diploma students at Perkins approved CTE centers who are concentrators

		Applied Mathematics		
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**Measurement definitions, Post-Secondary:**

Code	Indicator	Numerator	Denominator	Rules/comments
1P1	6 month Post-Program Placement	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	CTE concentrators who completed their program during the program year [calculated as the reporting year minus 2]	2-year lag;  remain enrolled in postsecondary education,  [DATA SOURCE: NSC Data & internal college enrollment data]  are in advanced training,  [DATA SOURCE/DEFINITION: needed]  military service,  [DATA SOURCE: internal college graduate survey]  or a service program that receives assistance under title I of the National and Community Service Act of 1990,  [DATA SOURCE/DEFINITION: needed]  are volunteers as described in section 5(a) of the Peace Corps Act,

				<p>[DATA SOURCE/DEFINITION: needed]</p> <p>or are placed or retained in employment.</p> <p>[DATA SOURCE: internal college survey]</p>
<b>2P1</b>	Earned Recognized Postsecondary Credential	Of the CTE concentrators for whom data could be collected, those who received a recognized postsecondary credential either during their participation in the program year (calculated as reporting year minus 2), or within 1 year after completing [meeting all graduation requirements and graduating] the program, excluding programs that are ending or have ended.	CTE Concentrators who completed their program in the program year (calculated as reporting year minus 2) and excludes programs that are ending or have ended	<p>2-year lag;</p> <p>Cohort model approach to 2P1 – we are interested in the students who were concentrators AND who earned a credential both during their program and up to 1 year after completion. This is accomplished by reporting on a 2-year lag</p>
<b>3P1</b>	Non-Traditional Program Concentration	CTE concentrators who are males, females, or who identify as non-binary who are	CTE concentrators enrolled in programs that are non-traditional for males or females	

		enrolled in programs designated by the NAPE crosswalk as being non-traditional.		
VTP1	Pathway/Academic Momentum	Of those students in the denominator, the number of students entering with at least 9 (should it be 6?) post-secondary credits awarded prior to entry.	All first-year students who were in high school in the last 24 months.	relies on data from Vermont's Dual Enrollment system.

**Required Narrative D: [3] Describe the procedure the eligible agency adopted for determine SDLP that addressed the three minimum requirements**

- a. describe the process for public comment under section 113(b)(3)(B) of Perkins V as part of the development of the State determined levels of performance<sup>5</sup>:

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<sup>5</sup> PUBLIC COMMENT. —

(i) IN GENERAL. — Each eligible agency shall develop the levels of performance under subparagraph (A) in consultation with the stakeholders identified in section 122(c)(1)(A).

(ii) WRITTEN COMMENTS. — Not less than 60 days prior to submission of the State plan, the eligible agency shall provide such stakeholders with the opportunity to provide written comments to the eligible agency, which shall be included in the State plan, regarding how the levels of performance described under subparagraph (A)—

(I) meet the requirements of the law; (II) support the improvement of performance of all CTE concentrators, including subgroups of students, as described in section 1111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965, and special populations, as described in section 3(48); and

(III) support the needs of the local education and business community.

The Agency of Education organized work and focus groups with representatives of secondary CTE programs, including administrators, CTE teachers, CTE school counseling coordinators, and special populations coordinators, and post-secondary CTE programs over late spring and summer, and fall of 2019. These meetings were convened to accomplish the following: develop an understanding of new requirements, determine the best approach for interpreting and implementing the new definition of concentrator, determine the most practical indicator of program quality in secondary programs, develop operational definitions for each special population and the numerator and denominator for each accountability measure, and explore any additional state indicators of performance – in line with Vermont’s strategic goals for CTE -- that would serve to deepen the public’s understanding of career technical education.

After the focus groups had completed their work, the Agency of Education's CTE team consulted with the Governor's Office, via the Deputy Secretary of Education, who is appointed by the Governor.

The Agency of Education's Federal Education Support Programs division, which oversees the state's plan for Every Student Succeeds Act was consulted about accountability linkages between ESSA and Perkins V. In meetings we discussed opportunities for programmatic collaboration, including ways to identify and support special populations, particularly those students experiencing homelessness while they are in CTE programs.

The Vermont Department of Labor's Director of Workforce Development, who oversees the majority of the state's Workforce Innovation and Opportunity Act, was consulted about linkages between the WIOA accountability system and the requirements of Perkins V.

In January of 2020, the Agency of Education released the draft state plan, and the draft baseline accountability measures for public comment. The plan was available on its website. The Agency of Education created a special e-mail in-box to receive and acknowledge receipt of any public comment submission. The Agency of Education also held public hearings in four regions of the state at the end of January 2020. The Chancellor’s Office of the Vermont State Colleges system, the partnering state level agency, was also given the opportunity to comment on the plan via a separate communication and for the entire month of January 2020.

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(iii) ELIGIBLE AGENCY RESPONSE. – Each eligible agency shall provide, in the State plan, a written response to the comments provided by stakeholders under clause (ii).

**b. an explanation for the State determined levels of performance that meet each of the statutory requirements<sup>6</sup>:**

Generally, the state’s guidelines for “meaningful progress” are based on the actual performance, which is differentiated by banding of the performance levels, due to the relatively small numbers of students participating in CTE in Vermont:

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<sup>6</sup> State determined levels of performance shall, at a minimum—

(aa) be expressed in a percentage or numerical form, to be objective, quantifiable, and measurable;

(bb) require the State to continually make meaningful progress toward improving the performance of all career and technical education students, including the subgroups of students described in section 1111(h)(1)(C)(ii) of the Elementary and Secondary Education Act of 1965, and special populations, as described in section 3(48); and

(cc) have been subject to the public comment process described in subparagraph (B), and the eligible agency has provided a written response;

(dd) when being adjusted pursuant to clause (ii), consider how the levels of performance involved compare with the State levels of performance established for other States, considering factors including the characteristics of actual (as opposed to anticipated) CTE concentrators when the CTE concentrators entered the program, and the services or instruction to be provided;

(ee) when being adjusted pursuant to clause (ii), be higher than the average actual performance of the 2 most recently completed program years, except in the case of unanticipated circumstances that require revisions in accordance with clause (iii); and

(ff) take into account the extent to which the State determined levels of performance advance the eligible agency's goals, as set forth in the 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%

In instances where meaningful progress has not been made for a minimum of two years in a row, or where the indicator has been exceeded by 10% for two years in a row, the local performance indicator targets (state and Federal) will be renegotiated/reset. The new target will be at least the average of the last three years of actual performance. When two successive years of actual local performance data are not available under the current state plan, the average of most recently available actual local performance data will be used.

In the event of an unmet performance indicator, the first target reset will require at least 30% of the recipient’s allocation to be dedicated to improvement strategies/programs aimed at improving performance of unmet indicators, and as indicated by performance data, the specific subpopulations of students, so long as the improvement strategies/programs are of sufficient size, scope, and quality as defined in this plan. The state will require that the funds be use on targeted and underperforming student populations. Subsequent performance indicator target resets will require increasing percentages amounts of the recipient’s allocation to be dedicated to performance improvement strategies.

Note that informational indicators are provided for informational purposes only, and for the length of this state plan, there is no requirement for recipients to allocate funds to improve these indicators, unless the comprehensive local needs assessment indicates improvement in this area is necessary. The data may be used to inform future performance indicators.

- c. **describe how the State determined levels of performance set by the eligible agency align with the levels, goals, and objectives [of] other Federal and State laws.**

The inclusion of both the four-year and extended graduation rates align with the State of Vermont's ESSA reporting requirements. Using both will assist the state in comparing CTE and non-CTE students across the state by increasing alignment in data definitions and reporting and increasing coherence across Federal programs for schools and communities.

In accordance with Vermont's approved ESSA State Plan, the final time that students will be tested for English language arts and mathematics using a state-wide standardized test is 9th grade. Vermont's Perkins-funded CTE programs primarily serves students in grades 11 and 12 (at the secondary level) and beyond. If the State were to use the assessment data used for its ESSA accountability measures, they would be two years old. As part of the State's ESSA career and college ready indicators, a menu of options are available including industry recognized credentials (IRCs). The "national career ready certificate," as measured by ACT's "WorkKeys" assessments, is an industry recognized credential. Three different assessments constitute this credential which evaluates certain job and workplace readiness skills. Vermont will use WorkKeys assessments to measure academic proficiency in CTE concentrators. Vermont will use these assessments to both measure growth in proficiency of CTE students during the time in which they are enrolled in CTE programs, and to provide a value-added assessment to students' experience in CTE programs. Vermont's previous academic proficiency measures looked at the academic proficiency of CTE concentrators before they were CTE students, didn't measure growth, and thus was a poor indicator of academic quality in CTE centers.

The use of WorkKeys means that many more students will have the chance to earn a recognized postsecondary credential and will increase the visibility and use of recognized postsecondary credentials in the workforce/industry. The use of WorkKeys also presents the State, and local secondary CTE programs, with an opportunity to articulate the credential with post-secondary recipients to help students transition to post-secondary education and reduce duplication of instruction.

The choice of Recognized Postsecondary Credential (RPC) as the indicator of quality for CTE programs is based on the RPC being the most equitably distributed and accessible quality indicator across the state. Vermont's decision to select WorkKeys assessments as a measure of academic proficiency means that the "national career ready certificate" will also count in the program quality indicator. Vermont's WIOA state plan also measures attainment of recognized post-secondary credentials, including in Title II adult education and literacy programs. Vermont's Legislature, in Act 80 of 2019, set a goal of 70% for post-secondary credential attainment. The State's Workforce Development Board has created a "training and credentialing committee" to develop policy and processes to help the Department of Labor, Agency of Education, and other State-level, one-stop partners manage approval of recognized post-secondary credentials, which is particularly important in helping to determine which credentials have value and which credentials will count for accountability purposes.

The inclusion of additional state measures for student attainment of postsecondary credits will help Vermont measure the connection between secondary and postsecondary CTE programs,

and the availability of postsecondary credits to CTE students. Vermont has also elected to develop a state-level post-secondary metric that looks at recent high school graduates who enter Community College of Vermont and Vermont Technical College with at least 9 post-secondary credits, a metric that communicates the importance of the State's investments in dual and concurrent enrollment programs as means of elevating and advancing students along the pathway for post-secondary education. A 2016 study<sup>7</sup> from the Journal of Career and Technical Education suggests that CTE students who have the opportunity to take dual enrollment course work in high school are more likely than their non-CTE peers to continue into and to complete associate degree programs at the community college level.

Vermont has identified, as state level indicators of program quality, Work-Based Learning participation, and attainment of recognized post-secondary credentials. The work-based learning measure helps Vermont assess whether quality work-based learning experiences (HOW TO DEFINE?) are equitably available across the state, as well as making sure that Vermont captures what we consider to be the most important measures of student outcomes (Credentials, Postsecondary Credits, and Work-Based learning experiences), including those activities particularly related to personalization of learning, and career guidance and exploration activities which, in Vermont, include student participation in introductory courses in 9th and 10th grades.

The measurements of the participation rates of 9-10th graders and 11-12th graders will help Vermont communities understand access to CTE programs for middle grade students, and will help to inform the State's policies on access to CTE, as well as to measure how individual centers and sending schools are meeting the strategic goal to promote collaboration among and coordination between education contexts.

The measure of CTE students who took a pre-tech program will help Vermont assess the efficacy of our Pre-Tech CTE programs and career preparation activities aimed at helping students understand themselves and their access to high quality career and technical education programming.

**Required Narrative D: [5] describe how the agency will address disparities or gaps in performance...**

At the state level, the Agency of Education will analyze data on the core indicators of performance to identify gaps in performance across students' groups, across programs at CTE centers, and within each CTE center. The gaps in performance, particularly of special populations, and of historically marginalized populations, will be examined for trends across the state. Historically Marginalized Students are those students who have been historically

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<sup>7</sup> Dietrich, Cecile; Lichtenberger, Eric; Kamalludeen, Rosemaliza. (2016). "Predicting Community College Outcomes: Does High School CTE Participation Have a Significant Effect?" Journal of Career and Technical Education, Volume 31, Number 1.

underserved by educational institutions for any one, or more than one, characteristic including ethnic and racial minorities, English Learners, students with Free and Reduced Lunch, students with disabilities, and students who are migrant, foster, or homeless. Historically Privileged Students are those students who have none of the characteristics that are associated with being underserved. This information can be found in the [Vermont Agency of Education's Every Student Succeeds State Plan](#). There is some overlap with the special populations mentioned in Perkins.

These trends will be discussed in Perkins quarterly planning meetings with all subrecipients in order to develop targeted interventions to take advantage of economies of scale for statewide and state-level intervention (e. g., professional development), and in order to identify and discuss scalable best practices.

Each recipient will analyze their own performance information and identify gaps in performance to be addressed in annual updates to their four-year Perkins local application and award agreement. Each recipient will be expected, in the comprehensive local needs assessment, to consider their performance metrics, and in particular any performance gaps that exist, and adjust their plans, based on the performance.

**Required Narrative B: [2] Implementing CTE Programs/of Study: [b] describe process and criteria used for approving locally developed programs/CPs**

Vermont has an existing approval review process (State Board of Education (SBE) Rule 2380) for state approval of locally developed programs of study/career pathways. The criteria include, but are not limited to: demonstration that the content is based on industry standards including occupational, workplace, and academic skills; the programs competencies are aligned with Vermont's rigorous academic standards as required by the Every Student Succeeds Act; the program prepares students for one or more industry recognized credentials upon completion and/or is articulated with a postsecondary program that offers such a credential; the program has one or more articulation agreements with postsecondary education and training programs; the program has a career technical student organization (CTSO) as an integral part of its course of studies; the program has strategies to achieve gender equity in enrollments and outcomes. Vermont has adopted the Common Core State Standards and the Next Generation Science Standards. Vermont's State Board of Education has adopted "Education Quality Standards" that require all schools to ensure their curriculum is aligned with the rigorous standards approved by the Board (see SBE rules 2111 and 2120.5) and all students, including those who qualify for either 504 or IEP plans, must meet the same state standards.

State Board of Education rule also requires that the regional advisory board that supports the regional technical center, as well as the school board for the LEA that operates the center, jointly approve the offering of the program.

The regional CTE center must submit a justification of why the program is necessary in the local economy. The applicant must analyze local and state labor market information to justify the

investment of funds in the program. As mentioned previously, the Vermont Department of Labor recently published labor market analysis that is aligned to the boundaries of each technical center region to better inform the types of programs that should be offered in each region.

Our approach to program of study implementation relies on an underlying theory of approach: that successful programs of study implementation relies on age appropriate career exploration and development activities that consider pre-technical (introductory) CTE programming in the context of career readiness. The offering of pre-technical exploratory and foundations courses needs to also be considered as part and parcel of career development which also includes career counseling and advising.

Our model of career development is outlined in the [Career Development Progression](#) which organizes career development activities into four categories: career awareness, career exploration, career preparation, and career training. Career counseling and advising, generally a responsibility of school counseling coordinators, is one of the activities schools engage in to help students understand themselves, their aspirations, and to begin to understand the world of work, and the academic and technical skill requirements of various careers in which the student may be interested. Gone are the days where each school offered industrial arts and home economics. These courses started to be removed from the curriculum in the early 2000s to make room for more math and English instruction in response to Federal policies (No Child Left Behind Act). In the 21st century, there is great potential for schools to implement makerspaces<sup>8</sup>, and some schools are doing that with and without collaboration and coordination with the CTE centers.

Career development activities help ensure students take the right sequence of courses to achieve their goals. It should be noted that some larger schools employ flexible pathways coordinators and work-based learning coordinators as part of their counseling and advising programs. The activities of these positions also fit under the umbrella of the career development progression and help to inform a student's pathway to graduation and ultimately to readiness for careers and college.

As we consider career counseling and advising as part of a more comprehensive solution to career readiness, we must be aware of national research that suggests career counseling and advising at the middle school level is critically important: students are beginning to make decisions about themselves and their abilities that will affect the rest of their lives. Based on social and cultural pressures, students begin to develop a perception of what they can and can't do at this time based on perceived and real cultural limitations and biases. At the same time,

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<sup>8</sup> "Makerspaces come in all shapes and sizes, but they all serve as a gathering point for tools, projects, mentors, and expertise. A collection of tools does not define a makerspace. Rather, we define it by what it enables: making." Makerspace Playbook School Edition 2013

there is a risk of disengagement. Young women, minorities, and at-risk students are particularly at risk of disengagement and in some cases of dropping out of school<sup>9</sup> entirely.

Middle school is the best time to ensure that young women understand and have the support to develop aspirations for the opportunities in Vermont and beyond in science, technology, engineering, and math (STEM) fields and other fields that pay a livable wage. This means that adults in formal and informal advising and counseling capacities need to be able to manage their own bias, understand the opportunities in the labor market and post-secondary education, and be able to meaningfully connect all the pieces, including to CTE, for students and their families.

The Council of Chief State School Officers in partnership with the American School Counselor Association, et. al recently released a document entitled "[The State of Career Technical Education: Career Advising and Development](#)." The report states that only 27% of middle school counselors connect students with CTE coursework or career pathways and of those who did report using it as a strategy, 9 out of 10 reported it as effective or extremely effective.

Our strategic vision speaks to the need for systems to be equitable, efficient, integrated, and collaborative as values and strategies to achieving all of the goals, but notably, the goals that are related to collaboration and coordination, and to comprehensive counseling and advising.

Our high schools operate largely on their own. Our regional CTE centers were developed to serve those high schools, and in some ways operate on their own and serve more students from the attached high school, at least in terms of offering introductory CTE courses – a function of proximity and convenience. Issues like scheduling, calendars, graduation requirements, and coordination of other programs and services can be points of frustration between high school and CTE center administrators, but programs and services like career counseling and advising doesn't have to be one of those areas.

The Agency of Education will be undertaking some work with policy makers to revise the existing set of statutes and SBE rules that govern pre-technical/"try-out" courses to allow for more flexibility in order to be able to serve as many students as possible in as creative a way as possible while still ensuring students have a high quality experience. Additionally, and as is mentioned throughout this plan, we are planning on working with middle grades teachers, high school academic teachers, and CTE teachers in a coordinated way to make system wide improvements to mathematics instruction. We learned from Perkins IV that continuous improvement related to math instruction is difficult and required a coordinated approach among multiple districts and across multiple regions of the state.

Finally, this item of the plan is closely aligned with the strategic goals mentioned earlier.

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<sup>9</sup> Association for Career and Technical Education. "[Career Exploration in Middle School: Setting Students on the Path to Success](#)." Retrieved December 2, 2019.

**Required Narrative B: [2] Implementing CTE Programs/of Study: [e] describe how the agency will involve parents, etc. in planning, development, implementation, and evaluation of its CTE programs**

First and foremost, parents and students and all other named parties in the law will be required to be involved in the Comprehensive Local Needs Assessment process.

Secondly, as part of our program quality improvement process, we will involve students, parents, teachers, administrators, faculty, counselors, and local businesses and labor organizations, as appropriate in the review of any program that is not meeting the standard established in Perkins, state law, or the SBE rules.

Partners that are named as part of a program of study will be key to the review of programs in need of improvement, as will the partners (particularly post-secondary), who could be a part of the program of study, but are not. This approach will have implications for the quality review of post-secondary programs, especially those that are funded under Perkins.

In terms of development of a career pathway/program of study, currently business and industry, post-secondary partners, and CTE administrators and teachers are involved in the process. We will rely on secondary CTE centers to help engage families in the implementation stage of the programs, especially in terms of helping to design materials that will be accessible to families.

As the state works to implement state-level strategies for comprehensive career guidance systems, we have a significant opportunity to begin the work with families in middle grades and to develop useful tools and resources with state and Federal funds that will help families make informed pathway decision.

**Required Narrative B: [2] Implementing CTE Programs/of Study: [c] describe how the will... 1. Make information on approved programs of study and career pathways and guidance and advisement resources, available to students, parents, reps of secondary and postsecondary education and special populations, and to the extent practicable, provide that information and those resources in a language students, parents, and educators can understand**

The Agency of Education will publish on its website and use other mechanisms to push to communities of interest, the information about the state-wide career pathways/programs of study that are being developed or that are available. The Agency already uses its website and other communication mechanisms to provide information about work-based learning program standards and dual/concurrent enrollment programs.

The Agency of Education and partners will develop guidance and advising resources about career pathways and programs of study and general tools for those involved with guiding and advising students in the process of developing personalized learning plans, as required by State law. In the past year, Vermont's Legislature authorized the creation of a standing Career Pathways committee of the State Workforce Development Board. When the committee

convenes, AOE staff work closely with members to secure statewide approval of Career Pathways. This process is not specific to only secondary and postsecondary CTE programs, but certainly includes them. We expect that each career pathway will have a plan of study, intended to complement the personalized learning process, that identifies courses/experiences from grades 7 through 14, and that includes pre-identified dual/concurrent enrollment courses that will advance a student along their chosen path.

We expect to increase our engagement with the Vermont School Counselor's Association so that their members have a deeper understanding of career pathways and of career technical education, and so that they can advise us on the state-wide implementation of career guidance systems.

The Agency of Education ensures that its materials are compliant with Section 508 so that individuals with disabilities can access information. All documents that are intended for public access and use are run through native accessibility checkers in our word processing software and any accessibility issues with the documents are resolved prior to the public release of the documents. All staff are trained to review documents in this way. Our web master ensures that the content of all pages, including images and video, are accessible to individuals with disabilities.

According to U. S. Census information, in the general population, Vermont has a very small population of English Learners—about 5.75%, and in our school age population, the percentage is even lower. Except for Nepali, Cushitic, Spanish, and Chinese, no other languages are significantly represented in our student population. Our refugee and immigrant patterns differ significantly from year to year based on changing geo-political issues, resulting in the prevalence of native languages in Vermont being highly volatile. Vermont defines languages as being present to a significant extent when the language represents 10% or more of the population or the most prevalent language if none are greater than 10%. We follow the guidance from the Office for Civil Rights regarding the existence of a “community of non-English speakers.” The guidance includes the presence of print or stream media specific to the speakers of a specific language.

We will make use of translation services in order to translate written materials in various languages. The most prominent non-English languages spoken in Vermont are French and Spanish, however there are some communities in which other languages are spoken. We would work with local Perkins administrators to ensure that the needs of those communities were met in our published materials. We would also permit recipients of Perkins funds to use the funds to develop and translate materials and resources at the local level so that communities of non-English language speakers have equal access to information about CTE programs, as required in the 1979 Vocational Education Programs Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, and Handicap.

**Required Narrative B: [2] Implementing CTE Programs/of Study: [c] describe how the Agency will... 2. Facilitate collaboration among eligible recipients in the development and coordination of career and technical education programs and programs of study and career pathways that include multiple entry and exit points.**

As required by the law, the Agency will convene quarterly meetings to ensure a more coordinated, streamlined approach to implementing both Perkins and the programs of study requirements. Our career pathways coordinator, working in partnership with secondary and post-secondary CTE administrators, teachers, and business and industry has the overall responsibility for facilitating collaboration and developing implementation plans for all of the state developed programs of study.

Our approach to this point, and it will continue to be so, is to permit local administrators to make the decision to participate in the development and delivery of State developed career pathways. We rely on post-secondary partners, regardless of whether they receive Perkins funds, to voluntarily participate in the development of the pathways and to assist us in identifying opportunities for articulation.

As a means of furthering the implementation of our programs of study/career pathways work, Vermont will permit the formation of programmatic consortia that meet the requirements established in Perkins.

Under the overarching goal of ensuring the CTE teacher and leadership workforce is supported and prepared we will provide ongoing professional learning opportunities to teachers, leaders, and partners related to the standards and specific functioning of each career pathway and the multiple on- and off- ramps.

**Required Narrative B: [2] Implementing CTE Programs/of Study: [c] describe how the Agency will... 3. Use State, regional, or local labor market data to determine alignment of eligible recipients' programs of study to the needs of the State, regional, or local economy, including in-demand industry sectors and occupations identified by the State board, and to align career and technical education with such needs, as appropriate.**

As identified in the strategic vision and goals for CTE and the workforce development system, alignment of programs with labor market data is a top priority. We will leverage the Comprehensive Local Needs Assessment as the start of a process of local reflection on program effectiveness and alignment. The burden will be on applicants to demonstrate alignment – to what career paths and post-secondary opportunities are their program aligned as supported by qualitative and quantitative student outcome data? The burden will be on applicants to demonstrate that their programs meet program quality criteria and standards established by the State Board of Education.

The Agency of Education will for secondary CTE programs, over the course of the four years of the state plan, publish program level Perkins performance data. Recipients of Perkins funds will be required to submit program level improvement plans. If, after two years, programs do

not demonstrate improved alignment with the labor market, improvement on the primary indicators, or for the indicators of specific student populations, the recipient will receive a warning that their program will be ineligible for Perkins funds. This warning will trigger a state level program quality review that examines the program's compliance with state statute and State Board Rules. The program will receive a corrective action letter, outlining the areas in need of improvement. The recipient will create a corrective action plan and if, at the end of a 12-month period, the actions have not been completed or there is no improvement in the program's outcomes, the Secretary of Education will be asked to revoke state approval for the program, effective the beginning of the next school year.

**Required Narrative B: [2] Implementing CTE Programs/of Study: [c] describe how the Agency will... 4. Ensure equal access to approved career and technical education programs of study and activities assisted under this Act for special populations.**

Each school district in Vermont has the benefit of being served by a regional CTE center. Our existing laws allow students to attend a CTE center outside of their region when the program they want to take is not available in their region.

We do not consider equal access to be a significant issue, however we do recognize that sometimes the rural nature of the state can be a barrier to access, as can access to information about CTE programs. Our investment of resources in developing comprehensive career guidance systems and the related supports should assist in how students and families obtain access to information about CTE and programs of study.

We have created a requirement in the Comprehensive Local Needs Assessment process to consider the access and success needs of special populations. When this requirement is paired with the State Determined Levels of Performance and the local performance target negotiation process, the needs of special populations will be front and center.

As we developed the state plan it became clear that, due to turnover of key persons in the CTE centers across the state, that there is an inconsistent base of knowledge and understanding about the needs of special populations. Special populations coordinators and CTE school counseling coordinators frequently share the responsibility of supporting students in some centers and in others, the special populations coordinator seems to be focused on only supporting the needs of students with an IEP. Over the course of the state plan, the Agency will provide professional learning opportunities and technical assistance to recipients and partners to help ensure the needs of every student are met as effectively and efficiently as possible.

**Required Narrative B: [2] Implementing CTE Programs/of Study: [c] describe how the Agency will... 5. Coordinate with the State board to support the local development of career pathways and articulate processes by which career pathways will be developed by local workforce development boards, as appropriate**

Vermont's SBE rules governing CTE programs require state-level approval of all programs/programs of study/career pathways. Funding of these CTE programs requires approval at the state level. Local recipients are encouraged to work on the unique access and articulation requirements that may exist with a region, especially those related to how partner high schools will recognize a student's transcribed CTE experience.

**Required Narrative B: [2] Implementing CTE Programs/of Study: [c] describe how the Agency will... 6. Support effective and meaningful collaboration between secondary schools, postsecondary institutions, and employers to provide students with experience in, and understanding of, all aspects of an industry, which may include work-based learning such as internships, mentorships, simulated work environments, and other hands-on or inquiry-based learning activities.**

The Agency of Education has created a manual and standards for work-based learning programs in the state. We have provided technical assistance and professional development to practitioners. We will continue to provide state-supported leadership and technical assistance on matters related to work-based learning.

Successful work-based learning programs require positive working relationships between schools and employers at the local level. As the state moves to a more comprehensive approach for career counseling, advising, and development, the model will incorporate work-based learning. Under this state plan, recipients of the funds will be authorized to use funds in support of development and implementation of regional career counseling and advising, including work-based learning program coordination with partner middle and high schools.

As mentioned previously, the require Perkins quarterly meetings will assist in high level collaboration between secondary and post-secondary partners. Joint professional development between secondary CTE and post-secondary CTE teachers, especially professional development about programs of study will help us re-focus on ensuring that all elements of a program of study are implemented across all education providers.

**Required Narrative B: [2] Implementing CTE Programs/of Study: [c] describe how the Agency will... 7. Improve outcomes and reduce performance gaps for CTE concentrators, including those who are members of special populations**

There are three check-points for Vermont's CTE system to ensure it has positive outcomes for CTE concentrators and for our most vulnerable populations:

1. The Comprehensive Local Needs Assessment requires applicants to explore and reflect on their student level data – in particular the students of special populations. Where are they coming from, how well prepared are they, and what supports will the need when they get to us are central themes to the questions applicants will need to ask.
2. The State Determined Levels of Performance and local target negotiation will also focus on special populations. Vermont is adding an element that data will be reported at the

program level to help recipients better target interventions on CTE program improvement and on closing performance gaps for special populations

3. The 2-year update to the Comprehensive Local Needs Assessment is an opportunity for recipients to check in on the continuous improvement cycle they started 2 years ago. Were their assumptions and interventions correct? Did the selected strategies have the intended impact on special populations?

**Required Narrative B: [3] Meeting the Needs of Special Populations: [a] describe how the agency's program strategies for special populations (1) will be provided with equal access to activities assisted under this Act**

As required by the Guidelines for Elimination Discrimination on the Basis of Race, Color, National Origin, Sex, and Disability, the Agency maintains a process of civil rights compliance reviews of recipients of Federal funds that offer CTE. Vermont will maintain this process and use Perkins performance information, disaggregated by sub-population to ensure equal access to activities funded under the Act. As Vermont is only required to conduct two reviews a year, the local performance data will provide information about who is and is not being served well.

Vermont will provide professional development opportunities related to the needs of special populations. The Agency of Education will provide additional support as needed to CTE centers who are struggling to implement multi-tiered systems of support as required in the Education Quality Standards. Multi-tiered systems of support are intended to help schools recognize students when they begin to struggle, and to identify the causes and interventions. These systems are to be provided in addition to the systems that identify students with disabilities.

**Required Narrative B: [3] Meeting the Needs of Special Populations: [a] describe how the agency's program strategies for special populations (2) will not be discriminated against on the basis of status as a member of a special population**

Vermont requires each applicant, as part of their Comprehensive Local Needs Assessment, to conduct a review of their own demographic data against the demographic data of their service region and partner high schools.

Vermont requires each applicant, and the superintendent of the LEA that hosts the CTE center to sign assurances indicating that they will not discriminate on the basis of race, color, national origin, sex, disability, or age.

As part of program quality improvement processes, the Agency will conduct anonymous surveys on students in CTE programs and special population support programs to gather information about whether or not students of a special population feel discriminated against. The Agency of Education will also provide ongoing professional development and support to administrator and teacher about the requirements of the law, and how best to meet the needs of special populations.

**Required Narrative B: [3] Meeting the Needs of Special Populations: [a] describe how the agency's program strategies for special populations (3) will be provided with programs designed to enable individuals who are members of special populations to meet or exceed State determined levels of performance and prepare special populations for further learning and for high-skill, high-wage, or in-demand industry sectors or occupations**

The majority of students falling into the category of special populations are students with a disability. Each student's LEA is responsible for the special education services required in the IEP. The CTE center, as a service provider, implements aspects of the IEP. Over the last 7 years, the Agency of Education has worked to increase the understanding of special educators of what makes a CTE education unique, and why CTE programs aren't intended to be and can't be life skills training programs. We have provided guidance and development around accommodations vs. modifications in CTE programs to help special education administrators understand that certain aspects of CTE programs cannot be modified as it changes the essential nature of the program. The Agency will continue to provide technical assistance and support to the field in this area, and to help special educators understand there is a plethora of other supports and resources available in Vermont if CTE isn't an appropriate placement.

In terms of criteria for programs intended to support other special populations, readers are directed to the requirements for size, scope, and quality which are provided as baseline considerations for the use of Perkins funds.

**Required Narrative B: [3] Meeting the Needs of Special Populations: [a] describe how the agency's program strategies for special populations (4) will be provided with appropriate accommodations; and**

As the special education monitoring team at the Agency works with the CTE team, we strive to provide guidance to special education/IEP teams, high schools and CTE centers on the appropriate placement of students in CTE, blind admissions processes, and the differences and applications of accommodations vs. modifications in CTE programs. We will continue to meet with special education and CTE administrators. We will provide technical assistance as appropriate and when requested.

**Required Narrative B: [3] Meeting the Needs of Special Populations: [a] describe how the agency's program strategies for special populations (5) will be provided instruction and work-based learning opportunities in integrated settings that support competitive integrated employment.**

Vermont acknowledges there are several new classes of individuals identified as "special populations" in Perkins V. In our efforts to ensure that the needs of these new classes are met, we are working to modify our data collections and related guidance to ensure these categories are well-defined. As we make changes to our data systems, we will provide training to local

Perkins administrators, counselors, and data managers to ensure the populations are correctly identified.

As required by the Guidelines for Eliminating Discrimination on the Basis of Race, Color, National Origin, Sex, and Disability, Vermont will continue its efforts to monitor the civil rights compliance of Perkins recipients.

Within the Agency, Vermont's CTE team will continue cross-function efforts with colleagues on the Special Education Support team to ensure that school professionals working in special education and in CTE have the support they need so students with disabilities have equal access to programs funded under the Act. In 2018, we issued guidance for schools to help them navigate special education rules and the rules governing CTE in Vermont. As part of this effort, we provided professional development on accommodations and modifications so that school level professionals could better understand the difference between accommodations and modifications, and so that they could understand types of accommodations that were appropriate in the CTE environment.

As required under existing Vermont law, each area career and technical education school must employ a full-time special populations coordinator whose role is to ensure all special populations receive the support they need to access and be successful in CTE programs. These coordinators are also the primary resource for supporting students on individual education plans, and for coordinating with the local education agency in the provision of additional supports.

Vermont expects to continue to provide technical assistance to recipients in these areas and to improve data reporting back to schools on these populations as part of their comprehensive local needs assessment and accountability processes.

**Required Narrative B: [2] Implementing CTE Programs/of Study: [h] provide definition for "size, scope, and quality" used to make funds available to eligible recipients**

These criteria are provided to assist recipients of funds make decisions about which programs and activities could and should be funded with Federal funds. These criteria apply both to "CTE programs" in the traditional sense, and to "activities" or "services" which may also be referred to programs. The use of "activities" or "services" may be thought of as: activities in support of career counseling and advising, or a program of "activities" intended to support non-traditional students.

**Size (numerical value)**

1. Minimum number of programs: As required in Perkins, to be eligible to receive funds, recipients must run at least 3 Perkins eligible programs
2. Minimum number of students: The minimum number of students will be 7

3. Minimum amount of equipment and materials needed to operate the program as evidenced by RAB and ongoing program advisory committee review of local program input needs
4. Minimum number of staff. Program teaching staff: student ratio outlined in SBE rules is adhered to. Student support program/"services" is staffed consistently with appropriately trained individuals.
5. Minimum number of internships, practicums, or work-based learning experiences: 2

#### **Scope (curricular considerations)**

1. The written and practiced curriculum reflects a progression from grade 7 to 14, including elements of counseling and advising
2. The curriculum offers academic, technical and employability skills (work-based, distance learning, etc.)
3. The curriculum is aligned to the needs of industry and includes high skill, high wage and in-demand programs
4. The curriculum provides opportunities to obtain recognized credentials, industry certifications or degrees aligned with the career pathway
5. The curriculum shows a progression of instruction towards an occupation or profession, and has related counseling and advising, and integrates CTSOs

#### **Quality (measurable results)**

Meets minimum requirements established in Statute and SBE rules.

1. Students are achieving program goals and objectives; and making progress with respect to the indicators
2. The program has licensed teachers providing instruction and certifications aligned with industry standards
3. Program participation results in dual credit / concurrent enrollment course passing; multiple current articulation agreements exist with in-state and out-of-state institutions, including Registered Apprenticeship programs
4. Students consistently earn pre-determined recognized credential, certificate, license or degree during or with 6 months of program completion
5. The RAB is actively involved in reviewing the center and its programs and services for quality and equity of access.

## 6. Transparency

### **Required Narrative C: [2] Describe how funds received by the agency through the allotment made under section 111 (reservations and state allotment) will be distributed**

Section 111 of the law requires the Secretary of Education (U.S.) to allot to Vermont an amount that is not less than that received in FY 2018. In FY 2018, Vermont received \$ 5,037,372 (the “Perkins 5 allocation”).

#### **PERKINS BUDGET SUMMARY**

Vermont 2018 Allocation: \$5,037,372

Amount reserved for eligible recipients (85%):

Reserve: \$400,000

Formula Distribution: \$3,881,766

Amount reserved for State leadership activities (10%): \$ 503,737

Amount reserved to administer the State plan (5%): \$251,867

From that allocation, and according to requirements and formulas described in Section 112 of the law, Vermont assigns 85%<sup>10</sup> of its allocation to be distributed to eligible secondary and post-secondary 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<sup>11</sup> \$400,000 (9.34%) for a 50%/50% split between “secondary reserve” and “post-secondary reserve.” The grants from the reserve funds will be focused on improving priority aspects of dual and concurrent enrollment programs for CTE students as identified by stakeholders and partners. Specifically, these funds would be used for updating and improving post-secondary curriculum and instruction aligned to career pathways and increasing access to dual/concurrent enrollment for historically marginalized populations. The criteria and process for granting of “reserve” funds are discussed in the “Purpose & Intent” section.

Vermont will divide the remainder of the 85% into “Perkins Basic – Secondary” and “Perkins Basic – Post-secondary” budget lines by maintaining the 75%/25% split, respectively. As noted above, the process for calculating the distributions are discussed later in this section. As compared to Perkins IV, the State increased the amounts available for post-secondary recipients in the reserve. We believe strongly that by assigning the majority of funds to programs that serve high school students we will have a greater impact on post-secondary career and college aspirations of those high school students, improve career and college readiness and reduce the

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<sup>10</sup> Section 112(a)(1): “From the amount allotted to each State..., the eligible agency shall make available – not less than 85% for distribution under section 131 or 132, of which not more than 15% of the 85% may be used in accordance with Section 112(c).”

<sup>11</sup> Section 112(c)

need for remediation at the post-secondary level (and thus potentially reduce student loan burdens), and have a longer-lasting, positive effect on our students and citizens.

The law allows up to 10% of the Perkins V allocation be held for “leadership” activities and Vermont will use the maximum of 10% to fund the following activities required or permitted by law:

- 1% of the Perkins V allocation (\$50,374) to serve individuals in State correctional institutions;
- \$60,000 for services that prepare individuals for non-traditional fields;
- 0.1% of the leadership fund<sup>12</sup> (\$504) to help recruit special populations to enroll in CTE programs;
- Remaining funds (\$392,859), in addition to those outlined above, will be used in accordance with requirements established in the law and detailed in the PURPOSE AND INTENT section of this plan. Leadership funds are used to pay for staff salary, benefits, and expenses related to the leadership fund purposes, and may be used on contracts and grants for activities required or permitted in Section 124<sup>13,14</sup>.

The Agency of Education, as the eligible entity that receives these funds, retains 5% of the Perkins V allocation for administration of this plan. The administration line of the budget is used to fund contracts, grants, and Agency staff salaries, benefits, and other expenses that are related to the administration<sup>15</sup> of the plan.

**Required Narrative C: [1] Describe the criteria and process for how the eligible agency will approve eligible recipients for funds**

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<sup>12</sup> Section 112(a)(2)(C): an amount shall be made available for the recruitment of special populations to enroll in career and technical education programs, which shall be not less than the lesser of (i) an amount equal to 0.1%; or (ii)\$50,000.

<sup>13</sup> Section 124(a): From amounts reserved under section 112(a)(2), each eligible agency shall (1) conduct State leadership activities to improve career and technical education; (2) report on the effectiveness of such use of funds in achieving the goals described in section 122(d)(2) and the State determined levels of performance described in section 113(b)(3)(A), and reducing disparities or performance gaps as described in section 113(b)(3)(C)(ii)(II).

<sup>14</sup> Section 124(b): The State leadership activities described in subsection (a) may include up to 24 defined permissive uses, with the 25<sup>th</sup> being “other State leadership activities that improve career and technical education.”

<sup>15</sup> Section 112(a)(3): “which may be used for the costs of (A) developing the State plan; (B) reviewing local applications; (C) monitoring and evaluating program effectiveness; (D) assuring compliance with all applicable

At the secondary level, career technical education<sup>16</sup> in Vermont is primarily delivered through regional shared-time career technical education centers, what the law defines as “area career and technical education schools (Section 3(3)).” Area career and technical education schools are included in the definition of eligible recipient (Section 3(21)).

Vermont is a small state and eligible recipients for Section 131 (Perkins Basic – secondary) funds remain generally the same as they were in Perkins IV, with two exceptions. With support and guidance from Vermont’s Perkins Regional Coordinator and other Department of Education staffers, Vermont examined the criteria for eligible recipients and for area career and technical education schools to ensure that our list of eligible recipients<sup>17</sup>/area career and technical education schools<sup>18</sup> met those criteria. Any entity that did not strictly meet the criteria was deemed ineligible to receive Perkins funds.

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<sup>16</sup> Section 8(5): Career and technical education means organized educational activities that (a) offer courses that (i) provides individuals with rigorous academic content and relevant technical knowledge and skills needed to prepare for further education and careers in current or emerging professions, which may include high-skill, high-wage, or in-demand industry sectors or occupations, which shall be, at the secondary level, aligned with the challenging State academic standards adopted by [the] State...; (ii) provides technical skill proficiency or a recognized postsecondary credential, which may include an industry-recognized credential, a certificate, or an associate degree; and (iii) may include prerequisite courses (other than a remedial course) that meet the requirements of this subparagraph; (b) include competency-based, work-based, or other applied learning that supports the development of academic knowledge, higher order reasoning and problem-solving skills, work attitudes, employability skills, technical skills, and occupation-specific skills, and knowledge of all aspects of an industry, including entrepreneurship, of an individual; (c) to the extent practicable, coordinate between secondary and postsecondary education programs through programs of study, which may include coordination through articulation agreements, early college high school programs, dual or concurrent enrollment program opportunities, or other credit transfer agreements that provide postsecondary credit or advanced standing; and (d) may include career exploration at the high school level or as early as the middle grades [further defined in the state plan]

<sup>17</sup> Section 3(21): For Vermont’s purpose, “eligible recipient means (a) a LEA, an area career and technical education school, [...], or consortium, eligible to receive assistance under section 131; or (b) an eligible institution or consortium of eligible institutions eligible to receive assistance under section 132.

<sup>18</sup> Section 3(3): For Vermont’s purpose, “Area career and technical education school means a specialized public secondary school used exclusively or principally for the provision of career and technical education to individuals who are available for study in preparation for entering the labor market.” High schools may not receive funds due to additional requirements that the eligible recipients provide CTE in not less than three career fields.

The Saint Johnsbury/Lyndon region of the state is the exception to the rule of how CTE is delivered at the secondary level in Vermont. In this region, the Vermont State Board of Education (SBE) has designated two private schools as the providers of publicly-funded CTE programs in the region, which are accessible to both publicly-funded high school students, and privately-funded students attending the private schools.

As required by the Strengthening Career and Technical Education for the 21st Century Act (Act), and according to the definition of “eligible recipient,” private schools may not be recipients of Federal funds. The State of Vermont notes the requirement of the law under Section 217 to ensure that students of private schools be allowed to participate in “career and technical education programs and activities, including programs of study” that are funded under the Act. This means that there are certain requirements which must be met under Section 217 of the Act.

The State also notes the requirement that CTE teachers, administrators, and other personnel of the private schools be allowed to participate in in-service and preservice CTE professional development programs funded under the Act after written request to the recipients. The State of Vermont, as required under the law, requires that the private schools provide written requests to any of the Perkins recipients that neighbor the private schools, should the private schools wish to have their CTE students participate in Perkins funded activities, or to have their CTE teachers participate in Perkins funded professional development.

This change also means that the State must address how the region gains access to the funds that are allocated to it. Caledonia Central Supervisory Union, St. Johnsbury School District, and Kingdom East School District are all eligible recipients and may elect to receive funds under the Act. Those funds, because of the nature of the grades serviced by the districts, would be limited in their application. The eligible recipients may choose to contract with private schools to provide CTE related services to the students that attend those schools.

There are only a small number of entities in Vermont that deliver “career and technical education,” that serve post-secondary populations and that meet the definition of eligible institution. The Community College of Vermont and Vermont Tech are the two eligible institutions that will participate in this State plan. Vermont conducted an analysis of the requirements of the law against the list of entities that received funds under Perkins IV to determine the list of eligible recipients of Perkins V funds and communicated the eligibility to those institutions.

### **Required Narrative C: [3] secondary allocations - describe the process**

For the upcoming program year, the amount of Section 131 funds for secondary programs and programs of study (Perkins Basic – Secondary) is \$2,911,325.

Vermont is divided geographically into 15 technical center (area career and technical education schools) service regions, with every town in the state assigned to a regional technical center. Per requirements for allocation of funds to area career and technical education schools (Section 131(e)), the regional technical centers in Vermont will be required to enter into a cooperative arrangement for the purpose of receiving funds under Section 131, that generally outlines the services and programs funded by Perkins funds that are being invested in the region.

Vermont uses the most recently available NCES/SAIPE population estimate data, as required in Section 131. In our allocation calculation spreadsheet, we maintain a listing of all regional technical centers with nested management unit assignments under each<sup>19</sup>. The spreadsheet calculates 30% of the allocation based on population estimates aged 5-17 in the districts of the service region, and 70% of the allocation for population estimates aged 5-17 living below the poverty line in the districts of the service region.

Vermont has several instances of exception handling to maintain compliance with the law while continuing to provide career technical education around the state. 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. They are assigned to a larger region, and their Perkins allocation is sub-granted through a larger recipient, North Country Career Center.

In another exception, the Vermont SBE has identified that students in certain regions (Springfield and Brattleboro) have choice about which technical center to attend. In instances where this occurs, the count of students is split equally between the two regions.

In another exception to the process, the Chittenden County region of the state is served by two technical centers (in Essex and in Burlington). To ensure equitable distribution of funds, the State takes the aggregate of full-time equivalent (FTE) students (a figure that is calculated as part of the state's funding formula for CTE) between the two centers and divides the Perkins student counts proportionally between the two centers based on the center's share of FTEs to the aggregate.

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<sup>19</sup> As required in Section 131(e)(2): "If an area career and technical education school...meets the requirements...then the amount that would otherwise be distributed to the local educational agency shall be allocated to the area career and technical education school, and the local educational agency based on each school, agency or entity's relative share of students who are attending

In a final exception, 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 (LEA) in the region that meet requirements established in the Act:

- Section 131(c): minimum LEA allocation is \$15,000 unless the LEA is part of a consortium, discussed in subsection f, or unless the LEA is in a rural, sparsely populated area and demonstrates an inability to enter a consortium.
- 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 Intent section.

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 consortia. 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.

It is important to note that any amount of funds allocated by the formula to an eligible recipient does not guarantee that the eligible recipient will receive those funds. As required by Section 134(a), “any eligible recipient desiring financial assistance...shall, submit a local application to the Agency of Education.” The local application will cover the span of the State plan, four years, with opportunities for minor modifications each year. The minimum contents of the local application are provided in the law, and the Agency of Education’s sample application is available in XXXXX APPENDIX.

The local application and any requests for Perkins funded activities must be informed by the comprehensive needs assessment and any performance related data.

### **Required Narrative C: [4] post-secondary allocations - describe the process**

The amount of funds, under Section 132, assigned for distribution to post-secondary education programs is \$970,442. These funds are distributed to the post-secondary eligible institutions according to the distribution of Pell recipients across the institutions.

Vermont developed a “Perkins Pell Grant Recipient Count” (see Appendix XXXXX) form for eligible institutions to report their Pell grant count to us. The form includes relevant definitions and information about program eligibility and requirements for use of funds in Section 135. Vermont has adopted post-secondary program eligibility criteria, identified in the Purpose and Intent Section. Any post-secondary program determined to not meet the program eligibility criteria may be removed from the eligible program list, with the consequence being two-fold: the Pell recipients in that program may not be counted for fund distribution purposes and allocated Perkins funds may not be used to support the activities of that program.

Eligible recipients are required to report Pell recipient student counts for the previous fiscal year and must provide counts by eligible program area. We also ask for identified career cluster and the program's "recognized post-secondary credential" outcome – industry recognized credential, certificate, and/or associates degree.

Pell counts for eligible post-secondary recipients are aggregated and the assignment of funds is calculated based on each institution's proportional (percentage) contribution to the aggregate. For instance, if one institution reports 100 Pell recipients in eligible programs, and the other institution reports 50 Pell recipients in eligible programs, the recipient count is totaled (150) and each institution's count is divided into that total to determine the proportional contribution to the count (institution 1 = 66.6% and institution 2 = 33.6%).

AOE monitors changes in Pell count by institution over time to flag potential reporting and validation errors. The Pell grant program has strict criteria and each eligible institution maintains its own compliance with the granting requirements established by the U. S. Department of Education (DOE).

It is important to note that any amount of funds allocated by the formula to an eligible recipient does not guarantee that the eligible recipient will receive those funds. As required by Section 134(a), "any eligible recipient desiring financial assistance...shall, submit a local application to the [Agency of Education]." The local application will cover the span of the State plan, four years, with opportunities for minor modifications each year. The contents of the local application are driven in part by the comprehensive local needs assessment and by the state determined levels of performance. The minimum contents of the local application are provided in the law, and the Agency of Education's sample application is available in XXXXX APPENDIX.

The local application and any requests for Perkins-funded activities must be informed by the comprehensive local needs assessment and any performance-related data.

**Required Narrative C: [5] describe how the agency will adjust the data to reflect changes in school district boundaries**

Since 2015, Vermont's district and school governance landscape has changed considerably due to a state legislative initiative called Act 46<sup>20</sup>. As a result, management unit boundaries have also changed. We anticipate additional changes to continue into at least 2020. These changes

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<sup>20</sup> [Act 46 of 2015](#) provided opportunities for school districts to unify existing disparate governance structures into sustainable systems of education delivery that are designed to meet identified State goals while recognizing and reflecting local priorities. The law established a multi-year process with incentives for communities that voluntarily merge into the most common governance models. Districts that did not pursue or achieve a voluntary merger were required to evaluate their ability to meet or exceed State goals, to talk with other districts, and to present proposals to the State Board of Education by December 26, 2017.

involve management unit mergers and changes to the geographic boundaries of the old management units. In some instances, the new management units do not align to existing technical center service region boundaries.

In our allocation calculation spreadsheet, we maintain a listing of all regional technical centers with nested management unit assignments under each. In the spring of each year we will review the changes to the management units and make changes to regional technical center assignments as needed. In the 2019-2020 program year, Vermont identified occurrences of management unit mergers causing town school districts to be assigned to a technical center that had not historically been associated with the technical center. We will use more current merger activity data to inform assignments of new management units when the newer data were not reflected in the NCES/SAIPE data.

Refer to Appendix XXXXX for the NCES/SAIPE summary sheet.

### **LIMITATIONS ON USES OF FUNDS**

While Section 215 of the Act allows funds to be used for activities beginning as early as 5th grade, Vermont will permit secondary recipients to use funds only for activities beginning in 7th grade. To ensure coordination and efficiency across secondary and post-secondary contexts, and to reduce duplication of efforts, Vermont will also restrict the use of post-secondary entities' Perkins funds to certain activities beginning in 10th grade.

Funds may not be used to replace a reduction of funding at the local level. Section 211 of the law says that funds made available under the act shall supplement, and shall not supplant, non-Federal funds expended to carry out career and technical education activities.

The required uses of funds list, outlined in Section 135, provides the primary guide for the types of activities that may be funded under Perkins. Generally, the list breaks down into six broad categories:

- providing career exploration and career development activities through an organized, systematic framework designed to aid students, including in the middle grades [down to grade 7], before enrolling and while participating in a career and technical education program. The State Board of Education's rules (2386(2)) already contemplate the role the technical centers should play in career counseling advising and development. In order to expand the impact of the Federal investments in Vermont's CTE system, eligible recipients are strongly encouraged to supplement existing efforts in career development, and to use these funds on activities that would primarily benefit students at their home middle and high schools. This can be accomplished through a variety of approaches, forming a consortium for the region so that Federal, state, and local funds can be pooled and braided is one of them.
- providing professional development for teachers, faculty, school leaders, administrators, specialized instructional support personnel, career guidance and

academic counselors, or paraprofessionals. At the time the comprehensive local needs assessment is developed, Vermont requires that professional development needs are considered in the comprehensive local needs assessment, and Vermont requires a four-year professional development plan to be submitted with the local application in order to ensure the use of funds meets the requirements of the law. This requirement aligns with our Education Quality Standards that require LEAs to engage in needs-based professional learning that aligns to their continuous improvement plans. (Refer to Appendix for the definition of professional development).

- provide within career and technical education the skills necessary to pursue careers in high-skill, high-wage, or in-demand industry sectors or occupations.
- support integration of academic skills into career and technical education programs and programs of study (POS) to support secondary CTE participants in meeting the challenging academic standards adopted by Vermont and that will be measured by WorkKeys and the NGSS assessment, and to support CTE participants at the post-secondary level in achieving academic skills beyond remedial courses.
- plan and carry out elements that support the implementation of CTE programs and POS and that result in increasing student achievement in the Perkins accountability system.
- develop and implement evaluations of activities carried out with funds under this part, including evaluations necessary to complete the comprehensive local needs assessment required by the law.

Section 135(c) allows eligible recipients to pool funds with one or more recipients. The activities of the pooled funds must align with the required uses of funds listed above. Eligible recipients will be permitted to pool funds when they form a consortium with a formal agreement that outlines, at a minimum, the fiscal agent, the period of the agreement, the parties to the agreement, the purpose and use of the pooled funds, and the budget for the pooled funds. The agreement should also detail how each members’ contribution to the pool will be calculated and should outline how disagreements among the consortium members will be handled.

Section 135(d) limits the use of funds for combined costs associated with direct and indirect administration of the grant to 5%. The Agency of Education maintains a process for approval of indirect rates. There are many activities and uses of funds that would fall to direct administration of the grant. A non-inclusive list of activities and uses of funds related to direct administration of the grant would be:

<b>Indirect Cost</b>	<b>Direct Cost</b>	<b>Excluded Cost for the whole application</b>
Organizational Wide Data, IT (Salary and Benefits, Contracted Services, Data)	Direct Instruction/ Support Services	Equipment cost that exceeds \$5,000.

Administration Salary, Benefits, PD, Supplies, Travel In the Business Office Only – HR, AP, PR, Accounting	Wages, Benefits, Supplies, Travel, Professional Development (PD)	Indirect costs recovered
Occupancy and Space cost for Business Office – Cost	Transportation- Contracted or Salary and Benefits	Contracted Services/Subgrants expenditures that exceed \$25,000
	Food Service -Salary Benefits, supplies/PD, Travel	The cost of all the Food
	Direct Admin Charges- Admin that works with the Children -Salaries/ Benefits, Travel, PD	
	Maintenance, Plant, Repairs Supplies, Salary and Benefits	Capital Outlay Expenditures/ Construction and Renovations
	Media, Books, Supplies	Transfer of funds
	Board wages and benefits	Debt/Penalties/Fees
	Superintendent	Entertainment

Regardless of the use of funds, eligible recipients must ensure that the services and activities (“programs”) funded under the act meet the “size, scope, and quality” criteria established in the PURPOSE AND INTENT section. Any “program” that does not meet the criteria established in all three categories may not be funded with Perkins funds.

Administrators should consider:

- whether or not the use of funds is the “highest and best” use of limited Federal investments

- the degree to which the funded “programs” contribute to achieving the vision and goals established for CTE in Vermont
- whether the use of funds contributes to a CTE system that is equitable, efficient, integrated, and collaborative
- whether the best use of funds should be expended on a program inside the regional technical center, or within the region at a partner middle or high school.

Funds may not be used to pay for individual student needs/costs or for expenses that benefit one student more than another. An exception to this is outlined in Section 135(b)(5)(S), and allows the funds to provide support to reduce or eliminate out-of-pocket expenses for special populations participating in CTE, including dual or concurrent enrollment programs, and supporting costs associated with fees, transportation, child care, or mobility challenges. An important consideration before Federal funds are used for these purposes is to determine whether or not the student is eligible for other state supports (e.g. VSAC Book Stipend for dual/concurrent enrollment courses). Use of this provision will be minimal and should not exceed more than 1% of an eligible recipient’s total allocation in a given year.

In instances where Federal funds are being used to deliver summer camps, after school programs, or similar activities to introduce students to CTE, or to provide career awareness, the experiences should be provided at no cost to students and families.

\*\* there may be additional restrictions added later – and they may also be removed from this section and included in a different section, or in an appendix.

**Required Narrative C: [9] provide State's fiscal effort per student, or aggregate expenditures**

In the transition year, Vermont established a new baseline for its fiscal effort related to career technical education using aggregate expenditures. For the fiscal year ending June, 2018, Vermont’s aggregate expenditures totaled \$12,264,089.38.

