

High School Completion Program

Fiscal Year 2021

**Policy
Manual**
July 1, 2020

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

Adult Education and Literacy (AEL)



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Definitions

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

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

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

Graduation Education Plan (GEP): a graduation education plan that identifies the learning opportunities and assessments that an individual student must complete in order to earn a high school diploma from the assigned high school plan partner. It is a written plan that becomes a signed agreement between the student, the high school, and the local adult education and literacy provider.

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

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

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

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

Personalized Learning Plan (PLP): A plan developed by the student, a representative of the AEL system and, when appropriate, a parent or legal guardian and a representative of the local educational agency (LEA) that defines the scope and rigor of academic and experiential opportunities for the student to meet an assigned high school's proficiency-based graduation requirements (PBGRs) and attain college and career readiness. The plan shall be developmentally appropriate and reflect the student's emerging abilities, aptitude and disposition.

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

Student Readiness and Eligibility to Draw Down HSCP Funds

Any Vermont resident may access the flexible pathway of the High School Completion Program who:

- is aged 16 or older,
- has not attained a high school diploma and has the goal to attain a high school diploma, and
- has dropped out or
- is at risk of dropping out and disengaging from educational services before graduation. (*Evidence of active engagement in school would include adequate attendance and active enrollment in other flexible pathways such as Work-Based Learning or Career Technical Education.*)

Students enrolled in school must include the HSCP as part of their personalized learning plan. Students who would like to earn their diploma through the HSCP must be assessed through the National Reporting System (NRS). Services provided to students who assess at an NRS level 4 or above on the TABE 11/12 in core instructional areas are eligible for reimbursement through the HSCP appropriation (and as per the *Services and Outcomes Reimbursement Rates* located in DataWorks). Students below that level may receive Adult Basic Education services as part of a plan toward meeting graduation requirements. ABE services are not reimbursable through the High School Completion Program appropriation.

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

program of learning will entail – including instructional content and rigor, progress assessments, and time commitment.

HSCP Participation and High School Proficiency

A certain initial skill level is necessary to indicate a student’s ability to access and engage with high school-level content. Those assessed at NRS level 4 on the TABE using form levels M or D can be special group enrolled (SGE) in DataWorks as the type identified as *Below NRS 5*. SGE does not automatically indicate enrollment in the HSCP or permission to graduate a student below NRS 5. Rather, it reflects the AOE’s agreement on a pilot basis to allow for AEL providers to access Education Fund reimbursements.

Please refer to the *Services and Outcomes Reimbursement Rates* to identify acceptable services eligible for reimbursement through HSCP. Appropriate AEL services will be made available to students at Levels 1, 2 and 3 with the goal of skill improvement and, if appropriate/desired, eventual HSCP designation in the AEL data tracking system. At no time is it necessary to discuss funding streams with students. Rather, a transparent and explicit conversation with students who require basic skills instruction and who have a goal to earn a high school diploma should occur so that students can make informed decisions about their short and long-term plans. Any queries related to students assessing below level 4 may be sent to the AOE via a prior approval form.

(Note: In the case of a student still enrolled in high school and requiring skill improvement in order to be eligible for HSCP reimbursements, no services may be delivered by an AEL provider using AEL funds for that purpose. It is allowable for the AEL provider to deliver such services under contract with the student’s high school.)

HSCP and Other Flexible Pathways

Dual Enrollment

HSCP Special Group Enrollment (SGE) only indicates the provider’s ability to be reimbursed for services and **does not** indicate that the student is being served in sum through the HSCP or has met all eligibility requirements. For those assessing below NRS 5, special group enrollment in the HSCP is for invoicing purposes only. Therefore, students assessing below NRS 5 are not eligible for dual enrollment vouchers. For those assessing at NRS 5 and above, dual enrollment classes must be documented in the approved Graduation Education/Graduation Plan.

Early College

Students special group enrolled at a minimum of NRS 5 in HSCP who choose to pursue the Early College Program as documented in their signed GEP may do so when all [Early College Program student requirements](#) are met. AEL providers should provide meaningful plan management services and may invoice for plan management during

the quarters that the students are enrolled at the college. Plan management will be the sole reimbursable service for students in the Early College Program with the exception of the quarter in which the student will graduate when transition services may also be reimbursed.

Career Technical Education (CTE)

Students in the HSCP may also participate in CTE programs. Students will need to apply to their regional CTE center for daytime programs; if the student's regional CTE center does not offer the program in which they wish to enroll or they are not able to enroll in the program of their choice (generally because admission requirements are not met or because the program is full), they may apply for enrollment into programs offered at a technical center outside of their designated CTE service region. Enrollments in both cases are funded through tuition charged by the CTE center to the student's school district of residence. Each high school within a CTE region receives state support in order to provide transportation to and from the CTE center. Transportation using this method should be coordinated with the high school in the student's district of residence. Transportation to a center outside of the assigned region may be a reimbursable expense, see additional information in the Technical Center Reimbursement section below.

Special Education Services

Those students in the High School Completion Program who are not enrolled in school have no entitlement to special education services. For those unenrolled individuals 22 years-old and below who were previously served on an IEP and continue to need special education services, it is advisable to work with the assigned high school to re-enroll them in order to receive those services. For those students co-enrolled in school and the High School Completion Program, responsibility for special education services remains with the school pursuant to 16 V.S.A. § 2941 and the Federal Individuals with Disabilities Education Act (IDEA). It is strongly encouraged that students protected under IDEA who access the HSCP remain enrolled in their secondary school in order to continue receiving special education services. It is equally encouraged that, whenever possible, an educator from the AEL provider participate in an IEP team meeting when considering HSCP as a flexible pathway to graduation to ensure that all parties make an informed decision.

Home Study Students

Home study students must take three out of five core classes at home in order to maintain their home study status. A plan to pursue a diploma through the HSCP should be included in the home study plan that is approved by the AOE. Otherwise, the student may contact the AOE's home study team to unenroll from home study and work with the AEL provider to pursue their diploma or GED.

Orientation and Enrollment

Students interested in the High School Completion Program should be introduced to the AEL system through the normal intake and enrollment process and enrolled in the AEL system **prior** to the development of a graduation education plan. When the student makes an informed decision to earn their high school diploma, a personalized learning plan (either GP or GEP) is developed and signed, and then the student may, depending on assessment scores, be enrolled in the HSCP special group for services reimbursed through this funding source, as described above. Pre-plan assessment scores and learner goals must be entered, and the plan must be signed by all partners before special group enrollment can be completed. Upon special group enrollment, related services may be reimbursable.

High School/Student Relationship

Students who are unenrolled from a high school and are assigned to a high school for the purposes of HSCP are not included in the school's Average Daily Membership (ADM) and, therefore their primary relationship and communication will be with the AEL provider.

Students in the High School Completion Program and not enrolled in the partnering high school during the period that plan services are being rendered may have previously been enrolled and been counted in the school's Average Daily Membership (ADM) report. In this case, high school plan partners will not be reimbursed during any quarter for services rendered on behalf of a student who was enrolled in a Vermont high school and included in enrollment records for ADM purposes during the academic year, including that quarter.

Upon successful completion of a graduation education plan or graduation plan, such a student would then be enrolled in the partnering high school for the purpose of graduating. Therefore, schools should report graduates of the HSCP on the school census report so that they are included in the Adequate Yearly Progress (AYP) graduation rate calculations used in accountability under the Every Student Succeeds Act of 2015.

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

Graduation Education Plan

A graduation education plan (also known as a Personalized Learning Plan (PLP) in accordance with 16 V.S.A. § 942) identifies the learning opportunities and assessments that an individual student must complete in order to demonstrate proficiency and earn a high school diploma from the assigned high school plan partner. It is a written plan that becomes a signed agreement between the student, the high school, and the local adult education and literacy provider. The plan shall define the scope and rigor of academic and experiential opportunities necessary for a secondary student to complete secondary school successfully as defined by the assigned high school. It must set clear learning goals and include the scope and rigor of services and skill proficiency required to meet the high school's PBGRs. There is a myriad of ways that students can demonstrate proficiency, so the focus should not be on replicating the high school experience but rather on the pathway and evidence required to meet the school's defined PBGRs. This does **not** mean modifying the PBGRs or the performance indicators associated with those PBGRs. The graduation education plan must identify a challenging and engaging array of learning activities and assessments that align with the life goals of the student and increase the student's persistence as they work to meet the articulated PBGRs. It will be recorded on a standard form and at a minimum will include the:

- profile of current transcript and skill proficiency in reading, writing, and math;
- list of student's career, educational and personal goals;
- proficiency-based graduation requirements of the high school they must meet in order to earn diploma;
- description of learning activities and performance indicators, which include NRS assessments and the school's local comprehensive assessments of proficiency;
- description of assessments, including planned assessments of both skill proficiency and growth in proficiency;
- list of providers responsible for delivery of specific services;
- signatures of high school representative, plan manager, student, and student's parent or legal guardian if available (parental signature is not required, but recommended if student is 18 or older); and
- anticipated date of graduation.

Graduation Plan (as distinct from Graduation Education Plan)

The High School Completion Program was originally intended to provide a pathway to graduation for students who had unenrolled from school, or those who would benefit from participation in a flexible pathway to graduation. As is made explicit in the policy regarding the Graduation Education Plan, the program serves the purpose of providing flexibility and innovation in the pursuit of a diploma, and addresses long-term student goals, skill improvement needs, and career exploration. Therefore,

the use of HSCP for the purpose of what might be referred to as credit recovery is inappropriate within the context of the existing policy and reimbursement schedule.

However, there are a number of students with high skills and low needs (credits and/or proficiencies) who would be well served by the existence of a program designed to (a) enable minimal credit attainment and/or (b) enable credit attainment within an accelerated period of time defined under the eligibility criteria below. Therefore, the following policy is established for the purpose of addressing the unique needs of such students, while protecting the integrity and funding of the High School Completion Program.

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

Eligible students must:

- be 16 or older;
- have low needs (e.g., do not require the services of other WIOA partners; do not require extensive counseling or transition services; can have the remaining services/instruction provided by AEL provider/assigned high school);
- be highly skilled - have a minimum of National Reporting System (NRS) 5 in all skill areas, using TABE 11/12 D or A for reading, writing and math; and
- have an anticipated graduation date within the quarter of entry to the program or the following quarter. The Graduation Plan will describe the learning opportunities being used to gain and demonstrate the knowledge and skill necessary to satisfy the graduation requirements of the high school partner and will be recorded on a standard form.

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

Baseline/Progress Assessment

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

Anticipated Graduation Date

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

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

Quarterly graduation lists may include only those students whose plans have been determined to be complete by both the AEL provider and the school. AEL providers must maintain documentation of school personnel's signature/email confirmation that the student has met the requirements of the PLP and has met PBGRs.

For those students whose skills assess below NRS 5, a *Request to Graduate* form must be completed and sent to the AOE for approval. Special group enrollment in the database is for invoicing purposes and is not an indicator of permission for a student to graduate through the HSCP. On the rare occasions in which student services meet the below criteria, the AOE may grant permission for a student with below NRS 5 skills to graduate.

I. Graduating students below NRS 5 who have the goal to earn a High School diploma and have a Personalized Learning Plan (GEP).

All students must demonstrate high school (secondary-level skills) proficiency (at least NRS 5 scores) in order to graduate through this flexible pathway per HSCP policy and consistent with the Education Quality Standards.

1. A prior approval request waiving the NRS level criteria will be required.
 - a. Note: If the student academically progresses to at least NRS 5 with instruction and services, a prior approval request is not required.
2. If it is anticipated that the student may require a special request in order to graduate at the end of the academic year (ending June 30th), all prior approval requests for graduation need to be submitted to the AOE before March 1st. Any

requests received after March 1st will not be considered for the academic year. All students and schools will need to be informed. The AOE will respond to requests by March 31st. For all requests seeking graduation approval prior to the end of the academic year (i.e., not with a cohort), these requests must be submitted at least 60 days prior to anticipated graduation date.

3. Criteria for review:

- a. Did the student receive direct instructional services from qualified AEL staff?
 - i. How were those services designed to meet the student's individual academic needs?
 - ii. What were the direct instructional services?
- b. Were other needed services leveraged through one-stop and other partners, such as assistive technology, disability evaluations, (e.g., KBIT test) and employment services through VR? If so, what were they?
- c. Is the amount of time that has elapsed, and the number of hours of instruction the student has received, reflective of their pace of learning in accordance with baseline assessments? (For further guidance regarding student pacing and recommended practice, please refer to the assessment manual.)
- d. Has the student demonstrated academic progress through increases in NRS scores?
- e. Has the AEL provider conducted formative assessments and adjusted instruction to meet the student's needs? If so, how many adjustments were made and what impact did they have? Provide specifics.
- f. Can the AEL provider demonstrate that the student, family, and school understand the final assessment scores and their grade equivalency/proficiency? Attach evidence.
- g. Has the school agreed and documented that the student has met the school's published graduation requirements? (Please see Education Quality Standards 2120.8 Local Graduation Requirements.) Attach documentation.
- h. Does the student understand they will lose access to a publicly-funded secondary school education once they receive a diploma? (Per 16 V.S.A. § 11 (a)(17))
- i. Have services been provided (by the school, AEL provider, VR or other qualified entity) to transition the student to employment and/or postsecondary after graduation? Attach documentation of transition services and plans.

- j. Was the PLP developed for this student appropriate based on the PBGRs and the goals of the student (e.g., sufficient supports and accommodations)? Attach PLP (GEP).
 - k. Has the provider included extenuating documentation of significant/extreme circumstances or a current documentation of a disability?
4. It will not be necessary to special group enroll a student when no reimbursements will be paid for the student's services. Permission to graduate students in this situation will be documented in the prior approval notice memo provided by the AOE and it will be indicated in DataWorks that the diploma was earned through the HSCP.

II. Enrolled students - additional considerations for request to graduate students assessing with skills below NRS 5:

Schools are required by law to provide a free and appropriate public education (FAPE) to all students. Vermont public schools are required to follow the Education Quality Standards "In order to carry out Vermont's policy that all Vermont children will be afforded educational opportunities that are substantially equal in quality. . . " 16 V.S.A. § 165 (a).

- HSCP is a flexible pathway for students at risk of disengaging from their education. What is the circumstance causing this "disengagement" and has reasonable accommodation been provided to the student by the school?
- Those students who are on an IEP must be encouraged to maintain enrollment in the school in order to continue accessing all of their [rights under the IDEA](#). Adult Education Providers do not provide Special Education services.
- References:
 "In Vermont, each high school is required to have one diploma for graduation that is issued to all students. Per Vermont's Education Quality Standards (EQS), adopted in 2014, all students graduating in 2020 must meet requirements for graduation by demonstrating evidence of proficiency, aligned to state standards, in the curriculum. It is critical, when developing and refining Proficiency-Based Graduation Requirements (PBGRs) that all students have access to, make progress, and demonstrate proficiency in the curriculum in an equitable manner. The PBGRs should be overarching, representative of the school, and accessible to all students. It is essential that PBGRs and expectations for proficiency are transparent and readily available to students, families, and community members." – [PBGR Access Plan](#)

Relevant State Board of Education rules:

- 2360.2.2 FAPE for students who have graduated: A student who has graduated from high school with a regular high school diploma shall not be entitled to a FAPE. A student who has not yet graduated and whose entitlement to a FAPE ends because the upper age limit of eligibility is reached as described in Rule 2360.2(a), may be allowed to complete the remaining academic year with IEP team approval and approval from the Agency of Education.
- 2360.2.3 FAPE for students who have dropped out of school: If a student drops out of school, that student may return at any time and request to be provided with a FAPE until the student graduates with a high school diploma or the student's entitlement to a FAPE ends because the upper age limit of eligibility is reached as described in Rule 2360.2.
 - Has the student and family been informed by the school of their rights under this entitlement?
 - Did the AEL provider participate in IEP team meetings to determine appropriateness of HSCP, and to provide updates on student progress toward proficiency and ensure continuation of services, including transition services?

Proficiency-Based Performance Projects

Proficiency-based performance projects, such as the Capstone and Challenge project process may be used and are encouraged as part of a HSCP graduation education plan. These projects are not in conflict with standards-based assessments, such as the TABE, and should be used to further skill-development and proficiency attainment.

Graduation Education Plan Jurisdiction

The issue of plan jurisdiction is not always clear and straightforward. To determine the assignment of plan management and high school partner responsibility, one must consider the student's district of residence and personal preferences, as well as other issues pertinent to the local adult education and literacy provider and high school plan partner. More often than not, this assignment will follow student residence. However, there are times when geographic barriers, school district anomalies, or student/school history require deviation from that norm. This can be further confused by student relocation after a plan has been initiated. The latter is especially problematic when relocation involves more than one local adult education and literacy provider. In order to reduce confusion, the following policy has been adopted.

AEL full-service centers and satellites (known here as local adult education and literacy providers) will develop working relationships with high schools within their proximate geographic regions. It is expected that when logical overlap exists, the relevant centers and/or satellites will resolve that overlap.

It is assumed that students will seek entry into the High School Completion Program through the local adult education and literacy provider in closest proximity. When this results in the potential for a plan partnership with the student's former school, or the school serving the student's current town of residence, then such a partnership should be developed. In the event that such a partnership is deemed inappropriate, then a waiver request process for high school reassignment should be followed (Waiver Request for Assigned High School form available in DataWorks.) Any further exceptions to this norm will be resolved by the High School Completion Plan Manager in cooperation with the Vermont Agency of Education if necessary. The decision-making process shall seek to increase students' likelihood of completing the program in a timely way.

In the event that a plan has been developed and initiated, and the student subsequently moves out of the plan partners' region and wishes to continue in the program, then responsibility for plan management and service provision can either remain with the original partners or transfer to new partners. If new plan partners are established, they will have the choice of adopting the plan as it exists or revising the plan to meet any additional graduation requirements of the new partner high school. In the latter instance, every consideration will be given to the needs and expectations of the student. That said, students must be informed that a change of provider and/or partner high school may significantly disrupt a plan's scope and timeline for completion.

During the quarter of such transition, plan management reimbursement under the circumstances described in this paragraph will be paid to the partner under which the majority of services, as determined by service reimbursement totals, has been rendered. Even in the event that wholesale plan revisions are made, additional plan development reimbursement will not be made under these circumstances.

Reimbursable Services

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

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

Plan Development Reimbursement

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

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

However, there may be limited legitimate circumstances under which plan development reimbursement should be allowed a second time. This would only be true if a student has transferred to a new local adult education and literacy or a different high school plan partner, and then only if there is a convincing need for a new plan. In these rare instances, a written request must be submitted to the AOE in advance. It is expected that under most circumstances the original plan will not only be forwarded but also revised as necessary.

Therefore, it is established as policy that HSCP plan managers may submit a written request to the AOE for secondary plan development reimbursement. Such a request must include a thorough explanation of the circumstances deemed to warrant such an exception. A determination on the request will be made by AOE/AEL staff.

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

Technical Center Reimbursement

Graduation Education Plans may include coursework offered through a regional career technical education (CTE) center, but because the school district of residence is paying their tuition, the cost of participation in daytime programs is not eligible for reimbursement through the High School Completion Program.

School districts can be reimbursed for transportation of students to and from technical center(s) in the region, as defined by the State Board of Education in Rule 2374.

Transportation using this method should be coordinated with the high school in the student's district of residence. In the event a student is attending a regional CTE center outside of the assigned region, and because transportation is not provided by the district of residence or the CTE center, the costs of necessary transportation may be reimbursed through HSCP.

The cost of participation in adult CTE programs, generally offered in the evening, may be reimbursed through the HSCP if other sources of support are not available.

Plan Management Reimbursement

Plan management reimbursement is not available for students below NRS level 5 as personalized learning plans are a funded requirement of the ABE grants. An exception is made for students assessed at a minimum of NRS 4 in all skill levels using the TABE 11/12, form levels M, D or A to reflect the AOE's agreement on a pilot basis to allow for AEL providers to access Education Fund reimbursements.

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

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

Responsibilities include:

- Working with the assigned high school and student to develop the Graduation Education Plan (GEP);
- Retaining documentation of the high school enrollment status of the student (e.g., drop-out documentation that includes the date) and ensuring that the high school enrollment status reported to the AOE matches the secondary school information in DataWorks;
- Ensuring that the GEP is aligned to graduation requirements of the assigned high school and that the pathway to graduation is clear for all parties (student, high school and provider);
- Managing student plan goals and goal target dates;

- Assessing student performance in accordance with state and federal expectations:
 - Progress assessing students Below NRS 6 in all skill areas after 40 – 80 hours of instruction, or prior to students completing the HSCP if they received services for at least six months;
 - Assessing students prior to EFL expiration for students that have not attained NRS 6 in all skill areas within a period of two program years (EFLs are valid only for the program year [July 1 – June 30] in which the assessment is given and in the program year that follows); and
 - Monitoring student progress at least quarterly.

Evidence of failure to provide plan management services during a quarter include:

- Expired goal target dates;
- Missing goals including a goal to earn a secondary credential in the student's DataWorks file;
- Expired EFLs;
- Missing or invalid progress assessments for students with skills under NRS 6;
- Incorrect high school enrollment status is identified after the 15th day of the last month of the quarter; and
- If the high school enrollment status reported to the AOE is different from what is recorded in DataWorks.

Additional guidelines around evidence may be provided as new issues arise.

Missing any of the following deadlines described below may result in delayed or disallowed reimbursement:

- All HSCP Special Group Enrollment edits are requested and new Special Group Enrollments are submitted on or before the 15th day of the last month of the quarter;
- A list of quarterly graduates (HSCP Plan completions) is submitted on or before the 15th day of the last month of the quarter;
- Invoices submitted for reimbursement, including those for approved sub-contract providers, are entered into the DataWorks HSCP invoicing system by the 15th day after the quarter end date.

Local Adult Education and Literacy Provider

Title 16 V.S.A. §§ 941, 942, & 943 gives the Secretary of Education the authority to approve agencies to provide educational services under the High School Completion Program. A local adult education and literacy provider will receive the state-approved reimbursement rate for services provided to HSCP students. The local adult education and literacy providers are approved as the lead providers. Public and approved independent high schools are approved as partner providers.

Approved HSCP Service Providers

Lack of local adult education and literacy provider status does not preclude an organization or individual from providing services under the High School Completion Program. An organization or individual may enter into a sub-contractual agreement with a local adult education and literacy provider for the purpose of providing specific services as part of a HSCP plan. In these instances, the adult education and literacy provider is the HSCP Plan Manager and is responsible for the development and management of the HSCP plan. Under these circumstances, the “approved provider” would be reimbursed for services at the negotiated rate included in the sub-contractual agreement, which may not be the same as the rate guaranteed to local adult education and literacy providers for similar services.

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

Sectarian or Parochial Schools as Approved or Contracted Providers

Sectarian or parochial schools (i.e., those operated under the authority of a religious institution and in which secular and sectarian aspects of its educational program are intertwined) may not serve as approved providers or contracted providers (now known as Local Adult Education and Literacy Providers) under the High School Completion Program. This policy is rendered in compliance with the ruling of the Vermont Supreme Court in *Chittenden Town School Dist. v. Dept. of Education*, 169 Vt. 310 (1999).