
TESTIMONY

Testimony To: House Committee on Education
Respectfully Submitted by: Zoie Saunders, Secretary of Education
Subject: **AOE Comments on S.304 – CTE (Senate Passed)**
Date: May 1, 2024

Thank you for the opportunity to provide testimony on S.304- An act relating to Vermont's career and technical education programs.

Career Technical Education is a critical part of our flexible pathways system, and ensuring a strong, high-quality cradle-to-career education system in Vermont.

Background and Overview

Augenblick, Palaich and Associates, Inc. (APA) was contracted by the State of Vermont, Legislative Joint Fiscal Office in October 2022 to conduct a study on Vermont's career technical education (CTE) program. The bill, in its current form, includes some of the APA recommendations, including intent language, inclusion in the State's facility study, and increasing career exposure requirements in middle schools. However, it falls short of including funding or structural reform measures recommended to remove barriers to access. However, the current bill you have from the Senate still represents an important step forward. The draft language makes meaningful strides toward elevating consistent standards for CTE across Vermont.

AOE Career Technical Education Coordinator

Though it isn't included in this bill, I also want to call out the Career Technical Education position included in the Senate Passed version of the budget. The position, along with this bill, go a long way in terms of expanding AOE's capacity to provide leadership, support and oversight of our Career Technical Education system, providing technical assistance and support that our colleagues in the field have long requested. I am grateful for your committee's advocacy for this position during the House budget process, and respectfully request that you ask the House conferees to concur with the Senate's inclusion of this position.

Finance and Governance Reform

As noted above, AOE [proposed changes](#) to the CTE finance system that were not taken up by the Senate this year. Our intent was to address the way CTE is funded as a first step toward broader governance reform next



session. [Our proposals](#), which would take effect over several fiscal years, are an answer to consistent feedback from the CTE system that the current funding structure is inadequate, prevents their ability to expand and offer the most impactful, in demand programs, and is a barrier to ensuring access for all students who want to participate in Career Technical Education.

We acknowledge that delayed findings from the APA report may have constrained our ability to move forward this legislative session, however we continue to maintain that funding and governance are both critical pieces of the puzzle, that must be addressed in concert. This session is an opportunity to begin this process, so that we do not continue to lose valuable time addressing a problem for which solutions have been identified. However, AOE strongly urges that the committee take up both governance and finance reform next biennium as a matter of urgency. AOE commits to supporting both the General Assembly and the field in navigating this process and continuing to develop and refine policy solutions.

Feedback on the Current Language

We appreciate the committee's consideration of our requested language in the Senate Passed version of this bill. As this bill has moved through the process, AOE has identified several areas where language can be adjusted or tightened, outlined below.

Sec. 1 – CTE Opportunities

The Agency supports Section 1, and would like to provide one small, but consequential edit to the Senate Passed language. Currently, the additions to 16 V.S.A. § 1541a contemplate visits to CTE centers and virtually delivered career exposure options. Currently many CTE centers also visit sending schools to deliver enrichment and exposure. The Agency believes that a clarifying friendly edit will help clarify that visits from CTE centers are an acceptable way to satisfy this requirement.

Suggested edit to page 1, line 14 (in bold):

(4) Provide students in grades six through eight with career enrichment and exposure. Such exposure shall include visits to, **visits from**, or equivalent virtual experiences with the school district's regional career and technical education center at least once between the grades of six and eight.

Sec. 2 – Career Development Policy

§ 1547. COMPREHENSIVE CAREER DEVELOPMENT POLICY

The Secretary of Education, in consultation with the Commissioner of 3 456789 10 11 12 Labor, shall develop a model Comprehensive Career Development Policy for all secondary students. The Secretary shall review the model policy not less than every five years and make a determination as to whether the policy needs updating. **The model policy shall ensure each student has the opportunity for robust discussion and planning regarding the student's career awareness, exploration, and future goals,**

consistent with the student's personalized learning plan. The policy shall require each school district to partner with its regional CTE center to develop and ensure the provision of career planning. **The model policy will reflect current expectations consistent with law, rule, and national and state standards to support school districts and CTE centers in the provision of consistent, high-quality career and college advising, and alignment to personalized learning plans, to ensure students have connected learning experiences that support post-secondary success.** The policy shall encourage districts to work regionally together in alignment on this policy implementation to preserve CTE capacity.

Sec. 3 – Career Development Policy Implementation -

The Agency suggests extending the timeline for the final model policy to provide an opportunity to incorporate input on the draft model policy. We suggest changing the dates to allow for a draft model policy and legislative update, with a longer implementation timeline to be worked out with the Vermont School Boards Association and the Vermont Association of Career and Technical Education directors:

- December 1, 2024 – Draft Model Policy **and provide Legislative Update**
- June 30, 2025 – Final Model Policy
- June 30, 2026 – Implementation / Adoption

Sec. 4 – Construction Aid

The agency supports career and technical education centers being included in the State's future construction aid program and suggests adding language to consider the feasibility and need for CTE spaces on middle school and high school campuses:

Sec. 4. CONSTRUCTION AID; CAREER AND TECHNICAL EDUCATION

It is the intent of the General Assembly to ensure that career and technical 14 education centers and their associated facilities are appropriately and equitably 15 included in future updates to the State's construction aid program under 16 16 V.S.A. chapter 123 **and that consideration is given to the need and feasibility of incorporating career and technical labs in under-utilized or renovated spaces on middle schools and high schools.**

Sec. 5 – CTE Oversight

The Agency has several additional edits to Subchapter 2 – Oversight of Career Technical Education

Minimum Standards

The Agency wants to ensure that any standards adopted by the Agency or the Board related to CTE are consistent with, and do not put us into conflict with federal legislation governing Career Technical Education (Perkins V). The Agency proposes the following addition:

§ 1532. MINIMUM STANDARDS, MEASUREMENT OF STANDARDS

(a) The State Board shall adopt by rule:

(1) Minimum standards for the operation and performance of career technical centers that include the education quality standards adopted by the State Board under subdivision 164(9) and section 165 of this title, **are consistent or do not conflict with federal legislation related to Career Technical Education.**

CTE Evaluations

The agency suggests adding language to evaluate the extent to which CTE programs are developing talent pipelines for high-demand industries:

§ 1533. CAREER TECHNICAL CENTER EVALUATION

(9) the extent to which the center's programs support career development pipelines to provide skilled graduates to fill critical vacancies in high-demand career fields in Vermont.

Sec. 6 Section 6 - Rulemaking

I met with the State Board of Education to explore roles and responsibilities of rulemaking with the intent to (1) ensure appropriate staffing, (2) promote expediency, and (3) engage broad public input.

In order to leverage the expertise and staffing in the AOE, we propose that the AOE be required to produce a draft proposed rule to the SBE for its consideration. This draft would be the starting place for the rulemaking process. The SBE should have time to consider the AOE proposal before moving into the formal rulemaking process, which begins with filing the proposed rule with ICAR. The SBE would then continue through rulemaking as the owner of the rule, and the AOE would be able to submit public comment on the rule in its further iterations before it is finalized and adopted.

Proposed new language:

"On or before X DATE, 2024, the Agency of Education shall submit a proposed draft rule to update State Board of Education Rule Series 2370 - Career and Technical Education. The State Board shall consider the Agency's proposal and shall file proposed rules on or before X DATE with the Interagency Committee on Administrative Rules (ICAR)."

This revised approach could help us fully leverage the strengths of the SBE and AOE and ensure high levels of coordination and a robust, open process. The SBE Chair and Vice Chair are supportive of this direction though we acknowledge that additional details still need to be finalized, specifically related to the timeline.

Sec. 7 – Postsecondary Program Alignment

In this section, the Agency suggests it would be simpler and less burdensome for the field for the Agency to take on the work of developing course articulation agreements, rather than requiring each CTE center to create their own. Accordingly, we proposed the following language:

1594. POSTSECONDARY PROGRAM ALIGNMENT

(a) In order to promote a seamless pathway from CTE to postsecondary opportunities, the **Agency of Education and** Vermont State Colleges Corporation shall **jointly** develop and maintain program and course articulation agreements **with all secondary CTE centers in for** the following **Career Technical Education** programs:

- (1) manufacturing;
- (2) engineering;
- (3) health sciences;
- (4) education; and
- (5) carpentry, construction, and building trades.

Finally, I suggest that we consider adding a provision to this section that would allow flexibility in which programs have postsecondary program alignment in order to be more responsive to changes in workforce needs. If this is of interest to the committee, we can bring proposed language.