

TO: Secretary Saunders

FROM: Concerns Regarding the Adult Education and Literacy Services WIOA Title Funding Opportunity and Grant Application

RE: Follow up on questions from October 17 meeting

DATE: March 11, 2025



Dear Secretary Saunders,

We are writing to express significant concerns regarding the recently released Adult Education and Literacy Services Workforce Innovation and Opportunity Act (WIOA) Title Funding Opportunity and Grant Application, due April 25, 2025. We are concerned that the Request for Proposal (RFP) was released without fully addressing the administrative changes and next steps identified by the **Adult Education and Literacy Student Access Committee Report dated January 18, 2024**, resulting in a system that will now be less stable and equitable. Issuing a 3-year RFP prematurely ensures the destabilization of the system for the next three years and may discourage anyone from applying to provide these services in certain geographic areas of the state. (See the attached Table for reference)

According to the report, “The purpose of the Committee was to *“provide recommendations in its report to the Joint Fiscal Committee and the House and Senate Committees on Education on how to increase equity and education access to Adult Education Programs.”*”

The Legislative Report: Adult Education and Literacy Student Access Committee, released on January 18, 2024, explicitly stated the following:

- *Revise State Board Rule Series 2400 to reflect recommended legislative changes, align with State Workforce governance and WIOA Combined State Plan, and modernize formula for distributing funds equitably.*

The current distribution formula was developed over 30 years ago, in 1994, and was not addressed prior to the release of the RFP. We are concerned about being locked into this formula for another three years but we also do not want to jump to another system that will have a debilitating effect on adult education and literacy services and integrated employment training in the State.

Additionally, the proposed RFP appears to be in direct conflict with the goals outlined in the Governor’s education transformation plan and proposed legislation regarding the allocation of educational funding. The proposed funding model in the bill aims to establish a **foundation formula** with a base amount per student and additional weights based on student need, school scale, and district sparsity. Shouldn’t a formula that addresses additional weights also be applied to adult education in the State?

In a previous communication, you indicated that the funding **allocation** was determined in accordance with Title 16 V.S.A. § 4011(f). However, this statutory language was meant to address the **appropriation** to adult

education and literacy providers. There was an expectation that the Agency would address the misalignment between statute and State Board Rule and the need for modernization of the funding formula after the January 18, 2024 report was issued.

An ***allocation*** policy that bases funding solely on a per-student model can present several dangers compared to an allocation model that considers regional factors such as those identified in the education transformation bill and specifically mentioned by the Committee as noted above.

The AELN providers encourage the AOE when addressing the recommendation of the Study Committee to ***modernize formula for distributing funds equitably*** to include the AELN providers to be a part of the committee that explores a funding formula that will be fair, equitable and ensure that providers have what they need to deliver high quality adult education and literacy services throughout the State.

It is overwhelmingly evident that further legislative and regulatory alignment is necessary before proceeding with a RFP.

Given the magnitude and the negative impact of these concerns, we strongly urge the Agency to:

- 1. Immediately rescind the current RFP.**
- 2. Extend the existing AEL grants through FY 2026 using the current weighted funding formula as was used for FY 25 allocations.**
- 3. Commit to aligning statutory language and funding models with the legislative goals outlined in the education transformation initiative, including needed updates to or changes regarding the State Board of Education and the State Board Rule Series 2400 in FY 26.**
- 4. Convene a workgroup including AELN providers to address the modernizing of a funding formula for distributing funds equitably.**
- 5. Plan for the Adult Education and Literacy Services WIOA Title Funding Opportunity and Grant Application to be released in the Spring of 2026 for FY 27 - FY 29.**

We appreciate your leadership and recognize the complexity of funding education across Vermont. However, we urge the Agency to reconsider this approach to ensure that all regions have equitable access to high-quality adult education and literacy services. Given that RFP postponements have been granted in the past under extenuating circumstances, we believe that the current situation warrants similar consideration.

We welcome the opportunity to discuss these concerns further and collaborate on a sustainable path forward.

Sincerely,

Joe Przyperhart
Vermont Adult Learning (VAL) Program Director

On behalf of,
The Adult Education & Literacy Network
Catherine Kalkstein, Central Vermont Adult Education
Michelle Faust, Northeast Kingdom Learning Services, Inc.
Sean-Marie Oller, The Tutorial Center
Tara Brooks, Vermont Adult Learning

TABLE 1: COUNTY ADULT EDUCATION AND LITERACY FUNDING COMPARISON CHART BY COUNTY AND CURRENT AEL PROVIDER

PROVIDER	COUNTY	% NEED FY 25 BASED ON STATE BOARD RULE 2410	% ALLOCATED BASED ON TITLE 16: VSA 4011(F) INTERPRETATION OF LANGUAGE BY AOE	TOTAL EXPECTED FY 25 ALLOCATION	TOTAL FY 26 ALLOCATION BASED ON RFP	DIFFERENCE PER RFP FY 26 OVER FY 25 (+/-)
TTC TOTAL	BENNINGTON	6.3878%	5.77%	\$ 461,755.00	\$ 416,460.00	\$ (45,295.00)
CVAE	LAMOILLE	5.2566%	5.07%	\$ 358,382.00	\$ 365,980.00	\$ 7,598.00
CVAE	ORANGE	5.3915%	4.02%	\$ 389,732.80	\$ 290,260.00	\$ (99,472.80)
CVAE	WASHINGTON	7.4031%	12.91%	\$ 504,724.00	\$ 932,077.00	\$ 427,353.00
CVAE TOTAL		18.0512%	22.00%	\$ 1,252,838.80	\$ 1,588,317.00	\$ 335,478.20
NEKLS	CALEDONIA	5.6560%	3.05%	\$ 408,855.78	\$ 219,948.00	\$ (188,907.78)
NEKLS	ESSEX	5.50%	0.47%	\$ 397,497.17	\$ 34,254.00	\$ (363,243.17)
NEKLS	ORLEANS	6.34%	5.99%	\$ 458,356.02	\$ 432,685.00	\$ (25,671.02)
NEKLS TOTAL		17.4957%	9.5100%	\$ 1,264,708.98	\$ 686,887.00	\$ (577,821.98)
VAL	ADDISON	5.48%	4.72%	\$ 396,009.51	\$ 340,740.00	\$ (55,269.51)
VAL	CHITTENDEN	17.41%	25.31%	\$ 1,258,868.92	\$ 1,828,096.00	\$ 569,227.08
VAL	FRANKLIN	8.50%	7.09%	\$ 614,624.11	\$ 512,011.00	\$ (102,613.11)
VAL	GRAND ISLE	2.97%	0%	\$ 214,894.96	\$ 32,451.00	\$ (182,443.96)
VAL	RUTLAND	9.32%	9.46%	\$ 673,858.50	\$ 683,282.00	\$ 9,423.50
VAL	WINDHAM	6.92%	8.99%	\$ 500,143.77	\$ 649,028.00	\$ 148,884.23
VAL	WINDSOR	7.46%	6.71%	\$ 538,957.21	\$ 484,968.00	\$ (53,989.21)
VAL TOTAL		58.0653%	62.7300%	\$ 4,197,357.00	\$ 4,530,576.00	\$ 333,219.00
TOTAL STATE		100%	100%	\$ 7,228,686.00	\$ 7,222,240.00	\$ (6,446.00)

Prepared by Vermont's Adult Education and Literacy Network 03/10/2025