

From: **Michelle Faust** <michelle.faust@neklsvt.org>
Date: Wed, Dec 11, 2024, 4:42 PM
Subject: FY 26 Funding allocation
To: Castle, Robin <robin.castle@vermont.gov>

Dear Robin,

I'm reaching out to thank you for your continued partnership and transparency as we make the transition away from HSCP and work to create efficiencies and improve the quality of Adult Education and Literacy (AEL) services in Vermont. Your leadership is appreciated.

I wanted to let you know that I am going to reach out to Jill and Zoie to share concerns I have about the potential to put into policy and practice the distribution of state (and federal) funds based on a straight per-pupils basis. As I shared with you during our meeting, this would have devastating consequences on NEKLS and the Vermonters it serves and it is incumbent upon me to elevate these concerns.

As you know, both the [Adult Education and Literacy HSCP Student Access Committee](#) (Access Committee) and corresponding [report](#) identified as a critical next step to review and make recommendations to modernize adult education [State Board Rule Series 2400](#), including the funding formula that has governed the distribution of AEL funds for decades. These rules have not only governed the distribution of federal WIOA funds, but also how we have historically distributed state funds that have and continue to be governed by 16 V.S.A §4011, §4025 and §945. As a result of the passage of [Act 113 \(2024\)](#), and with the exception of the addition of Education Funds as comprising 40% of the state appropriation, the language of how the State determines how much funding is needed (and should be appropriated) to support the statewide adult education system has not been substantially changed. For this reason, I have significant concerns that the AOE may choose to interpret minor language changes in the manner you have described and choose to ignore the remaining recommendations of the Access Committee and what the AOE testified to in the House Education Committee last year.

If I am understanding you correctly, what is currently under consideration with general counsel would effectively set policy without fully exploring and engaging the necessary stakeholders and taking into consideration two legislatively required reports, the Access Committee report and the [Act 78 Integrated Adult Education and Training System Study](#), which seems premature at best and lacking in transparency or process for such a consequential decision that would have a multi-year impact. This seems to be in direct contradiction (and intent) to the work that we engaged in last year, which was to finally give AEL the due consideration and support necessary to sustain a high-quality system that focuses on improving student outcomes. It also seems counter to legislative actions taken in supporting the K-12 education system which rolled out a progressive funding approach through [Act 127 \(2022\)](#) which included two components outlined in a [JFO Issue Brief](#) that pertain to and are instructive for AEL funding and service delivery that I would ask the AOE to reflect on:

1. ***New pupil weight categories added for sparsely populated districts and small schools.*** As you know NEKLS is responsible for serving an area of the state that is notoriously geographically isolated and sparsely populated. With this reality come significant costs in delivering services, especially post-pandemic when other social service partners (including AJC One-Stop partners) struggle to appropriately staff their organizations.
2. ***Categorical aid is established for school districts with fewer than 26 English language learner (EL) students enrolled.***
 - a. ***Each school district with one to five EL students enrolled will receive categorical aid of \$25,000 for EL services; and***
 - b. ***Each school district with six to 25 EL students enrolled will receive categorical aid of \$50,000 for EL services.***

As you know and as an example, in FY23 NEKLS served 12 English language learners. However, NEKLS does not receive IELCE funds like other AEL providers which essentially acts as a categorical aid. However, NEKLS still serves ELL (ESL) students and this is effectively more costly due to issues of scale and exacerbated by NEKLS geographical and sparsely populated service region.

To be clear, this is in no way a reflection on you, your team, or the spirit of collaboration that you have demonstrated. I am sharing this with you in a similar show of transparency and with the deepest respect, and to ensure that I have not misunderstood what you shared in our 1:1 meeting on the thirteenth. If there is something I have misconstrued or if there is something I can contribute to a policy conversation please let me know.

Thank you,

Michelle

Michelle Faust M.S.
Executive Director
Northeast Kingdom Learning Services, Inc.
55 Seymour Lane Suite 11
Newport, VT 05855
(802) 334-2524 direct line
(802) 323-3290 cell
(802) 334-6555 fax