

TO: House and Senate Committees on Education and Appropriations  
FROM: The Adult Education and Literacy Network (AELN)  
RE: Adult Education and Literacy HSCP Student Access Committee Report  
DATE: January 24, 2024



The Adult Education and Literacy Network (AELN) respectfully submits this memo in follow up to the Agency of Education's testimony regarding the recently released [Adult Education and Literacy \(AEL\) HSCP Student Access Report](#). We hope this memo serves the purpose of providing further clarity around some of the recommendations included in the report and context for how the recommendations will impact AEL providers and the students we serve.

The AELN sincerely thanks the Agency of Education and the AEL-HSCP Committee for their time and attention to this important issue, and for putting together a thoughtful proposal that meets the needs of AEL providers. **The AELN supports the legislative changes recommended in the report, and we ask for the General Assembly's support in enacting these changes.**

At the same time, we have concerns regarding some of the narrative in the report, and we acknowledge that the report does not address all issues relative to AEL funding. We hope the information below will provide context for how each recommendation will help strengthen our AEL system, as well as insight into some of the report's shortcomings.

***Moving all services under one umbrella: Retire the High School Completion Program (HSCP) described in 16 V.S.A. §943 and revitalize the Adult Diploma Program (ADP) described in 16 V.S.A. §945 to become the Adult Education and Secondary Credential Program.***

The report calls to sunset the HSCP, yet our high school credentialing service will essentially remain the same. AEL providers will continue to work with each student to develop a personalized learning plan for obtaining a secondary credential. To understand the impact of this recommendation, we can think of the HSCP as a funding source only – the "program" of helping Vermonters obtain their high school diploma remains the same, it just falls under a different name. The HSCP funding source goes away and is replaced with a grant under the newly titled Adult Education and Secondary Credential Program. This change greatly reduces the administrative burden created under the HSCP fee-for-service model by alleviating the incredible amount of time spent invoicing, both for AEL providers and AOE staff. **The AELN fully supports getting rid of the burdensome invoicing inherent to the HSCP fee-for-service model.**

The "new" Adult Education and Secondary Credential Program defined in the report is a revitalization of the ADP which currently exists in statute. The new name simply suggests that a participant of the program can earn a secondary credential, whether that be a high school diploma or their GED, both of which are services we already provide. The ADP as modified provides a much simpler and more straightforward funding alternative to current practice.

***Consistency in age eligibility: Make modifications to the Adult Diploma Program (ADP) described in 16 V.S.A. §945;***

The report recommends cleaning up the statutory language which governs the ADP, in part by making the eligible age of a student consistent across all sections of the legislation, and to have that age be 16 years or older. The current language is inconsistent and includes ages "16 or older" and "20 or older" as eligible program participants. The consequence of this has been that AEL providers have not received proper funding for students who are younger than 20 years of age. In FY23, AEL providers served over 600 students who are 16-20 years of age, and we have been unable to access full funding for these students. This has been a major factor in our chronic underfunding. **The AELN fully supports the recommendation to make the language clear that all students at least 16 years of age are eligible for adult education services, as this will greatly improve our ability to draw down funds for all students.**

**Honor our funding mechanism: Make modifications to 16 V.S.A. §4011(f) that governs how funding is determined for 16 V.S.A. §945 to ensure alignment with changes to ADP;**

The report proposes to honor the statutory language that has existed regarding funding for AEL providers. Our governing statute currently says that AEL providers shall be paid *“an amount equal to 26 percent of the base education amount for each student who **completed the diagnostic portion of the program\***, based on an average of the previous two years.”* Unfortunately, this has not been happening in practice. The report calls to actually implement this funding mechanism for determining AEL appropriations, which represents the intent of the AEL-HSCP Committee. **This calculation will provide sustainable and predictable funding for AEL providers, and we appreciate the Agency’s expressed commitment to seeing this implemented and expect future appropriations to be based on this calculation.**

The report also calls for this payment to be made “annually” (16 V.S.A. §4011(f) - *“Annually, the Secretary shall pay...”*). The AELN reads this language to refer to the *amount we will be paid each year*, not to *how* the payments would be distributed. Currently all of our AEL grants, including the ADP grant, are paid on a reimbursement basis and we can bill as frequently as we want (but not less than quarterly). We have been operating under the assumption that payments would continue in this way, especially since the “annually” language is already in statute and not something new being added. The AELN agrees it would be beneficial to confirm this assumption with the AOE, because if this language does represent a change where AEL providers are only paid once per year, that would be extremely problematic. AEL providers could not possibly wait until the end of the year to be reimbursed for a full year’s worth of expenses, but again, we do not believe that is the intent of the language. We fully expect the reimbursement system to remain in practice.

**Ed Funds v General Funds:** It is important to note that the report recommends state general funds as the appropriate source of funding for AEL services, as a critical component of the state’s workforce development system. We agree that AEL is an effective workforce development program, but **AEL providers do not take a position on where AEL funds should come from.** Our goal is to secure sustainable and predictable funding, and we support any solution that achieves this goal. We are keenly aware of the different opinions decision makers have regarding this question of funding source, and we are concerned about this unresolved issue threatening everyone’s common goal of strengthening Vermont’s AEL system with secure funding. AEL providers do not consider state general funds as better or worse than ed funds, and see the value in utilizing both funding sources in order to satisfy all parties. We encourage strong collaboration across AEL providers, the Agency of Education, and the General Assembly in developing funding solutions that are politically possible and logistically achievable so we can serve our students well.

**\*Eliminate the TABE testing as a funding mechanism:** It is worth calling special attention to the language from the report, which is currently in statute, that says AEL providers shall be paid for each student who **“completed the diagnostic portion of the program”**. This language gets to the heart of AEL funding challenges in recent years, and is the most relevant aspect of the report for addressing the concerns which caused the House and Senate Committees on Appropriations to establish the AEL-HSCP Committee in the FY24 State Budget – to address and reconcile current testing requirements that have proven to create significant barriers for adult learners who are trying to earn their high school diploma.

In FY2019, the Agency of Education adopted a revised federal standardized test that students are required to take before they can enter the HSCP. Students must also score at least a 4 in all three testing areas in order for AEL providers to draw down HSCP funds for a student (unless granted special permission by the AOE) and several of the most significant reimbursements are only available if a student scores 5 or higher in all three areas. We have found that this testing policy significantly increased the barrier to entry for the HSCP and hurts AEL providers’ ability to utilize the funding allocated by the General Assembly under Flexible Pathways to robustly serve students with the goal of earning their diploma. It also created a system where our most vulnerable Vermonters are actually held to a higher standard to earn their high school diploma than students in the public school system, who often do not face the same barriers to education. The report proposes to change this.

The intent of the AEL-HSCP Committee and this language is to do away with the burdensome TABE testing requirements, and instead make funding dependent on each student simply completing a diagnostic assessment, which is used by instructors to determine what areas of reading, writing, and math a student may need instruction in. The goal is to get a snapshot of where students currently stand academically, allowing the instructor to make sound choices for how to teach the new course content and what teaching approach to use. It is standard practice for us to assess where a student is at when they come to us, and we believe this practice should continue. **We believe the language referenced above represents a huge and necessary shift away from requiring that a student achieve a specific score on a specific test (the TABE test), to simply requiring that a student complete a diagnostic assessment in order for AEL providers to draw down state funds.** AEL providers consider this shift to be the most significant recommendation in the report, and we believe this

shift can and will address and reconcile the testing issue, if it is implemented in a way that aligns with the Study Committee's intent.

The report calls for the following activity to occur if the Legislature were to adopt the recommended legislative changes:

*Convene a collaborative design team comprised of school district and AEL provider staff to inform the development of an updated common statewide assessment program as described in 16 V.S.A. §945. Currently, the AOE has set aside funds to support stipends and submitted an amendment to a current contract to support facilitating this group and the development of a common AEL Portrait of a Graduate and Graduation Proficiencies for this assessment program.*

This language suggests that the "assessment" students will need to complete will be designed by a collaborative team of school district and AEL staff, which we support. This language also captures the goal of having statewide proficiency standards. This would entail shared agreement across AEL providers, AOE staff and school districts about what proficiencies a student needs to demonstrate to earn their diploma, as opposed to holding each student accountable to the varying proficiency standards of individual high schools. For example, currently, some high schools have language requirements while others do not. The intention here is to get a standardized set of proficiencies for all adult ed students. If the student satisfies the statewide proficiency standards, then that student can graduate and earn their local high school diploma. We believe this is another critical step forward in removing barriers for an adult student to graduate.

### AEL Student Numbers

While the AELN agrees with the legislative changes called for in the report, we have serious concerns regarding some of the report's narrative. Most significantly, **it is not true that "the AEL system overall has experienced a significant decline in enrollment"**. While student numbers may be lower than they were ten years ago, student numbers have increased significantly each year since the ending of the covid-19 public health emergency, see below for details. As we've mentioned in testimony, a large share of that growth comes from ELL students. To highlight this point, during the first six months of FY23, AEL providers served 421 ELL students. Compared to the first six months of FY24, where we are already serving 501 ELL students, this represents our largest growth in a student category, with a 20% increase YTD over YTD.

**Table 1. AELN Student Numbers per program**

	High School Completion Program	English Language Learning	Adult Basic Education	Total
Fiscal Year 2022	384	390	925	1,699
Fiscal Year 2023	433	575	844	1,852
YTD (6 months) Fiscal Year 2024	305	501	651	1,457

AEL providers also strongly disagree that the HSCP has fulfilled its mission. **We are seeing more students coming to us every year with lower skills and greater barriers to education.** We agree that in a perfect world, our schools would meet the needs of all students. That is not the world we live in today. In today's polarizing times, some challenges for certain students, especially students in the BIPOC or LGBTQIA+ communities, have actually increased. We have seen this play out time again in our communities. Public schools in Vermont are also understaffed, particularly in the Special Education department. AEL providers are tasked with catching the students who fall through the system, particularly students with disabilities that would be served by special education services. These are the students we serve and will continue to serve, across all ages, regardless of when they made the decision to exit the K-12 system. The K-12 system does not serve every student equally and not every student can thrive in traditional academic settings, and that has not changed. We are a safe space for all students, now, and it would be a misconception to believe that our public school system has evolved to meet the needs of vulnerable Vermonters or those who come from historically disadvantaged communities.