

TESTIMONY

Testimony To: House Committee on Education

Respectfully Submitted by: The Vermont Agency of Education

Subject: Adult Education and Literacy and Adult Diploma Program Eligibility

Date: May 7, 2026

Thank you for the opportunity to provide testimony related to eligibility implications for the Adult Diploma Program under 16 V.S.A. § 945. Following the passage of Act 113 of 2024, the Agency released the [Adult Diploma Program Frequently Asked Questions](#) document to address the changes made in the legislation. The following section of the FAQ addresses Adult Diploma students accessing Career Technical Education (CTE):

Q18. Will students taking advantage of the ADP still be able to access a tech center part time? Is that considered enrolling in school? If they can, will the enrollment cost be covered through the grant?

[Answer]: Adult CTE courses and other postsecondary technical skill credentialing programs are allowable when the cost is not covered by a school district. Those enrolled in a secondary CTE program have their tuition covered by their district of residence, even if they are not currently enrolled in a high school. These students are thus enrolled in the district that is paying tuition and are ineligible for AEL (and the ADP as part of the state AEL program). Under Chapter 037: Career Technical Education, an “adult student” enrolled in a secondary CTE program is defined in 16 V.S.A. § 1522(2) as one who has “completed high school” and is therefore not eligible for the Adult Diploma Program.

Allowing students enrolled in secondary Career Technical Education programs to also participate in the Adult Diploma Program would conflict with eligibility for Adult Education and Literacy (AEL) programs per Sec. 203(4)(B) of the [Workforce Innovation and Opportunity Act](#). CTE programs are schools providing secondary education. Those enrolled in school are not eligible for AEL services or the Adult Diploma Program per Federal and State laws.

It's unclear how many students would leave public school to pursue this option. With Vermont facing a nearly decade-long decline in graduation rates, keeping students enrolled through graduation is a statewide priority. AEL programs are designed for individuals not enrolled in school, offering flexible scheduling and support to transition into employment or postsecondary education.



The High School Completion Program (HSCP) was a reimbursement model that allowed co-enrollment with secondary schools. In contrast, the Adult Diploma Program (ADP) is a State grant program that must comply with federal Workforce Innovation and Opportunity Act (WIOA) Title II requirements. Expanding eligibility for currently ineligible students would create significant administrative burden and costs for providers and the Agency. Under the Adult Diploma Program, State grant funds are used to match federal AEL funding. If State AEL funds cannot fully match federal funds, Vermont risks failing to meet WIOA maintenance of effort requirements and could face federal financial penalties.

Students in the Adult Diploma Program who want concurrent training can instead access local Adult CTE courses or other WIOA, Title I programs. **Given these existing alternatives, the Agency does not recommend statutory changes and advises maintaining current eligibility rules under 16 V.S.A. § 945.**

Background

Previously, under the HSCP, students could be enrolled in high school **and** participate in the HSCP. The HSCP was not a grant program but functioned as a district reimbursement program that involved an intensive quarterly invoicing process. The Agency made reimbursements on behalf of the districts. AEL providers and Agency staff spent significant time on this invoicing process.

Conversely, the Adult Diploma Program is a State grant program that is administered by the Agency, and not by districts. In October of 2024, the Agency published a [comparison chart](#) to further clarify the differences between the HSCP and the ADP.

The [Adult Education and Literacy Student Access Committee](#)'s rationale included on page 7 that the legislative changes would support:

“Greater predictability, flexibility, and accountability for AEL providers to plan, develop, and deliver programs that can respond to the 12-month/year needs of populations that enter and exit the system on a rolling basis and that cannot be served when providers are reliant on a fee-for-service reimbursement model such as the HSCP.”

With the repeal of the HSCP, education funds previously allocated for the reimbursement program were shifted to the AEL state grant program under 16 V.S.A. § 4011(f). By shifting funds to a grant program, eligibility requirements for the ADP came into alignment with Federal law that mandates that the AEL program functions to serve those who are **not enrolled in secondary school** and who are at least 16 years of age. This alignment creates predictability in funding for AEL providers and ensures compliance and alignment with Federal and State laws.