VERMONT
AGENCY OF EDUCATION

LEGISLATIVE REPORT

Current State of Career and Technical Education

October 30, 2026

Issued by the Vermont Agency of Education

Background

Act 177 of 2026 directed the Agency of Education, in collaboration with the Vermont Association of Career and Technical Directors (VACTED) and the Vermont Superintendents Association (VSA), to issue guidance on or before September 18, 2026, on the following topics. The guidance must reflect the career technical education system as it exists on July 1, 2026, in an effort to provide clarity to the field prior to updates to the career and technical education rules:

1. updates to definitions, including definitions for “CTE programs,” “credentials,” “embedded academics,” and “satellite models”;
2. credit standards and competency-based pathways;
3. work-based learning sequencing aligned with Occupational Safety and Health Administration standards and federal hazard orders;
4. minimum safety, space, and equipment standards;
5. data and reporting alignment with Perkins V; and
6. explicit allowance for differentiated regional delivery models.

Following passage of Act 177, the Agency contacted VSA and VACTED to collaborate in developing this guidance. The summer schedule limited opportunities to convene the full group. With the approval of the committees of jurisdiction, the Agency received an extension to October 30, 2026. The Agency then held three focus groups with CTE directors and superintendents on September 22, October 6, and October 16, 2026. Agency staff facilitated each session and focus group participants discussed each topic required under Act 177 to identify where current definitions, rules, and practices are unclear or inconsistent. Participants reviewed draft language as it was developed. Their input is reflected throughout this document and in the conclusion of each section.

Throughout this guidance, requirements drawn from federal law, Vermont statute, or State Board Rule are cited to their source. Statements without a citation describe requirements and expectations the Agency administers through CTE program approval, monitoring, the federally required and approved Perkins V State Plan, and data collection. Where practice varies among centers or districts, this guidance notes that variation.

Draft Language

3.1a CTE Programs

This section defines a CTE program and identifies the elements a state-approved program must meet. Perkins V defines career and technical education and program of study, 16 V.S.A. chapter 37 refers to CTE programs without defining them, and State

Board Rule 2370 defines related terms but not the program itself. The definition below draws on all three sources.

Definition

A CTE program is a state-approved, coordinated, nonduplicative sequence of courses or instruction at the secondary level that provides rigorous academic content and relevant technical knowledge and skills in keeping with an approved set of technical standards aligned with industry needs; includes competency-based, work-based, or other applied learning; and leads to technical skill proficiency or a recognized postsecondary credential. A CTE program is subject to Agency of Education approval and CTE-specific monitoring under State Board Rule Series 2370, Chapter 37 of the Vermont Statutes, and Vermont's federally required and approved Perkins V State Plan.

A state-approved CTE program may be delivered at a regional CTE center or Canaan Memorial High School, as set forth in State Board Rule 2374, or through virtual delivery as part of a state-approved CTE program hosted by a regional CTE center. It may also be delivered at a satellite site, including a sending high school, under State Board Rule 2370.17, when the CTE center holds the program approval and a written agreement covers space, staffing, and oversight (Section 3.1d).

Elements of a CTE Program

A CTE Program must meet all of the following elements:

- **State approval and monitoring.** Every CTE program must be approved by the Agency of Education and must annually meet the program size, scope, and quality requirements set forth in Vermont's Perkins V State Plan and State Board Rule[1].

  New CTE programs must be approved by the Agency of Education, with a process starting at least one school year in advance of the program enrolling students.[2] This is to ensure program compliance with all state and federal requirements, Project WorkSafe review and approval of adequate, OSHA – compliant instruction space before student enrollment, and sufficient time and resources to maximize program success.[3] CTE centers are limited to starting one new program per academic year, to allow for sufficient support in new program

[1] State Board Rule 2380; Perkins V Sec 122. (d)(4) and (d)(5); Perkins V Sec. 134 (b); Perkins V Sec. 134 (c) (B) (i)
[2] https://education.vermont.gov/learning/flexible-pathways/career-technical-education/career-and-technical-education#program-of-study-approval-process
[3] State Board Rule 2380

design and implementation.[4] This is also to allow sending districts to support student access, plan, and pay for student enrollment.[5]

- **Coherent sequence.** The program is a "coordinated, non-duplicative sequence of academic and technical content" that progresses in specificity, beginning with all aspects of an industry or career cluster and leading to more occupation-specific instruction[6]. Nonduplicative refers to avoiding unnecessary repetition of content in the CTE program of study from other academic or career coursework and ensuring that the CTE learning adds unique value to the student's academic and career preparation.
- **Instructional Time.** A state approved CTE program meets for at least 120 minutes per day for up to two full school years or for at least 240 minutes per day for at least one full school year, in keeping with the time in program provisions set forth in State Board Rule 2382.
- **Rigorous academic content.** The program provides rigorous academic content aligned with the State academic standards adopted under ESEA section 1111(b)(1) and Perkins V.[7] Academic content is embedded in technical instruction and identified in the approved program.[8] Perkins V requires that programs include postsecondary credentials and/or dual enrollment credits that integrate rigorous academic content.[9] Perkins V further requires that CTE programs rigorously integrate relevant core academic content in math, science, English, and/or social studies.[10]
- **Technical skills.** The program addresses technical knowledge and skills, including employability skills, through adherence to the state-approved Program Proficiency Document (called "competency list" in State Board Rule).[11] Perkins V requires that all CTE programs are reviewed at least once every two years to ensure that they are aligned with the needs of industries in the economy of the state, region, or local area, and aligned to relevant postsecondary credentials and/or postsecondary credits.[12]
- **Applied and work-based learning.** The program includes technical skills-based, work-based, or other applied learning that supports academic knowledge, higher-

[4] https://education.vermont.gov/learning/flexible-pathways/career-technical-education/career-and-technical-education#program-of-study-approval-process
[5] Agency of Education practice aligned with the CTE program of study approval process
[6] Perkins V Sec. 3 (5)(a); Sec. 3 (41)(d)
[7] Perkins V Sec. 2 (1) and (2); Sec.3 (5)(a)(i); Sec. 3 (41)(a)
[8] Perkins V Sec. 134 (b)(4)
[9] Perkins V. Sec. 113 (2)(A)(iv); Sec. 134 (b)(7)
[10] Perkins V. Sec. 134 (c)(2)(A)
[11] https://education.vermont.gov/learning/flexible-pathways/career-technical-education/career-and-technical-education#program-proficiencies
[12] Perkins V. Sec. 3 (5)(a)(ii); Sec.134 (c); State Board Rule 2380.1.D

order reasoning and problem-solving skills, work attitudes, employability skills, and knowledge of all aspects of an industry, including entrepreneurship, and provides connections to employers and career pathways.[13] All work-based learning is reported to the Agency of Education in the annual June 30 data collection.[14] Career Work Experience and Co-op placements must be supported by signed training agreements or plans and facilitated by a licensed Work-Based Learning/Co-op Coordinator.[15]

- **Safety and equipment.** The program is delivered in classroom and lab settings that meet applicable safety requirements and are equipped to align with current industry standards.[16]
- **Safety instruction.** Each school district that receives federal and/or state funds for technical education and/or pre-technical education shall develop a program of safety for every program, ensure that it is properly implemented, and provide oversight to ensure that the quality of the safety program is maintained.[17] The Agency of Education collaborated with CTE program instructors to establish a list of required and optional safety credentials, by program area.[18] Given the significant safety risks inherent in many CTE programs, safety instruction must be completed within the first 45 days of the school year, in keeping with the expectations of the insurance providers that insure CTE programs and centers.[19] Adequate time should be incorporated into the first 45 days of the school year to maximize the ability of each student to complete the required safety instruction and to earn any required safety credentials. If a student is unable to demonstrate that they can meet required program safety assessment and credentialing requirements within the first 45 days of the school year, the CTE center has the right to remove the student from the program or to limit the tasks[20] that the student can do until the safety requirements are met.
- **Defined outcomes and credentialing.** All secondary CTE programs in Vermont, as set forth in Vermont's Perkins V State Plan, must include one or more postsecondary credentials and/or one or more college dual enrollment courses.[21] A full list of minimum program quality requirements is annually reviewed and

[13] Perkins V. Sec. 3 (5)(b); State Board Rule 2370.8, 2370.26, 2380.1.A, 2385.1
[14] Perkins Sec. 113 (b)(2)(A)(iv)
[15] State Board Rule 2385.1.B and C and 2385.2, 2379.5
[16] State Board Rule 2375.3.E and K, 2378.2, 2380.1.G
[17] State Board Rule 2378.1
[18] https://education.vermont.gov/documents/safety-foundation-tier-1-list
[19] Agency of Education expectation, informed by coordinated work with Vermont School Boards Insurance Trust
[20] Agency of Education supported practice, aligned with Section 504 of the Rehabilitation Act's requirements and with insurance provider requirements
[21] Perkins V Sec. 113 (2)(A)(iv), Program Quality Minimums Chart SY 2026-2027 | Agency of Education

updated by the Agency of Education, in consultation with CTE centers and programs.[22]

- **Postsecondary coordination.** To the extent practicable, the program coordinates with postsecondary education through programs of study, which may include articulation agreements, early college, dual or concurrent enrollment, or other credit transfer agreements that provide postsecondary credit or advanced standing[23]. While Perkins V includes articulation agreements in its reference to postsecondary coordination, only transcripted, portable college credits meet the Perkins V program quality reporting requirements for earned postsecondary credits.[24] Vermont does not allow students to co-enroll in CTE and early college. Under 16 V.S.A. §§ 941 and 946, Early College replaces a student's senior year and requires full-time enrollment at the postsecondary institution, so the Agency discontinued co-enrollment in Early College and secondary CTE effective FY25 to comply with statute, to avoid sending districts paying CTE tuition for students they no longer receive state reimbursement for, and to treat Early College students consistently.[25]

Areas Requiring Clarification in Statute, Rule, and Practice

Focus group participants asked whether CTE programs can be offered in the sending high school setting without meeting the criteria of a CTE program as outlined above.

- Under 16 V.S.A. § 1544, a high school that wants to establish pretechnical or career technical courses must consult with the Regional Advisory Board (RAB) for its CTE service region before establishing the program.
- Not all CTE regions have the same governance structure. Regional Advisory Boards are only required for CTE centers that operate within and are governed by the school board of a school district or supervisory union that meets the legal requirements of an LEA.[26] Regional technical center school districts are not required to have a Regional Advisory Board, and their governance boards are not required to include the same sending district representation as a regional advisory board.[27] As the language currently exists in statute, regional technical center school districts do not have a defined method for meeting the required consultation.
- Act 189 of 2018 emphasizes avoiding duplication of CTE programs between CTE centers and high schools. The nonduplication envisioned by Act 189 relies on

[22] Program Quality Minimums Chart SY 2026-2027 | Agency of Education
[23] Perkins V Sec. 3 (5)(c)
[24] Perkins V Sec. 113 (2)(A)(iv), Sec. 113 (3)(C)
[25] https://education.vermont.gov/document/memo-early-college-program-and-cte-co-enrollment-prior-approval
[26] 16 VSA §1541(b)
[27] 16 VSA §1571 and §1577

strong coordination between high schools and CTE centers and clear guidance from the Agency of Education.

- In current practice, approved CTE programs operate only at CTE centers, at Canaan Memorial High School, at Missisquoi Valley Union High School, or through a state-approved virtual offering hosted by a center. Focus group participants repeatedly asked what elements of career-focused learning could occur within a middle or high school setting.
- State Board Rule 2370.17 permits a satellite program at any site outside the technical center facilities and does not distinguish between a school and an employer site; in practice, however, instruction at an employer site has occurred through cooperative education and student apprenticeship placements under Rule 2385 rather than as a full satellite program, and the Agency has not yet approved a satellite program located at a business.

Focus group participants also asked which term describes the technical skills a student learns in a CTE program.

- State Board Rule currently uses the term “competency list” as part of the definition for course of study and course completion.[28]
- Agency-approved Proficiency Documents define the program of study for each CTE program area and cluster.[29] The Agency developed them with CTE program instructors between 2020 and 2022 to describe the common areas of instruction for each program area. State Board Rule still refers to a ‘competency list’ (Rule 2383.16), and the Proficiency Documents are not aligned to State Board-approved student performance standards. With the State Board expected to adopt statewide graduation requirements by December 2026, this alignment will need to be addressed in the rule update that follows.

Conclusion

Focus group participants identified two further points of confusion. The term “collaborative program” in State Board Rule 2370.6 no longer describes how centers and districts arrange shared programs, and neither statute nor rule addresses virtual delivery, although pilot virtual offerings now operate within approved programs. Act 189 of 2018 also uses “duplication” to mean overlap between CTE centers and high schools, a meaning distinct from the Perkins V usage within a program sequence. Centers and districts currently resolve these questions locally; resolution tends to be most effective in regions with strong, active regional advisory boards. Act 177 Sec. 5 directs the Agency to report recommendations to the General Assembly by January 15, 2027, and Sec. 3

[28] State Board Rule 2383.1

[29] https://education.vermont.gov/learning/flexible-pathways/career-technical-education/career-and-technical-education#program-proficiencies

frames this guidance as a precursor to updates to the CTE rules. The Agency will carry these definitional questions into the January report and into the rule update that follows.

3.1b Credential

This section defines the term credential and describes the two tiers of credentials Vermont recognizes for CTE programs. Perkins V and State Board Rule 2380 require that programs lead to a credential. Perkins V requires that programs lead to postsecondary credentials but does not provide a CTE specific definition of that term. State Board Rule also does not provide a definition. The Agency of Education has established the distinction between safety and foundational credentials and postsecondary industry-recognized credentials based on technical assistance provided to state agencies through a multi-year series of Perkins V Data Quality Institutes convened by the U.S. Department of Education.[30] Therefore, the credential definitions, lists, and requirements currently apply only to state-approved CTE programs and there is not currently guidance on credential attainment in the high school setting.[31] Any credential attainment in high schools would need to ensure that there is no duplication with existing CTE programs, in keeping with the nonduplicative emphasis included in Act 189 of 2018 and Perkins V CTE programs of study and program quality requirements.

Definition

A credential is a certificate or certification awarded by an issuing body to show that a student has met an industry-aligned and recognized standard in the skills assessed for each credential[32]. There are different types of credentials, and each type captures a set of skills.

Perkins V requires that a CTE program provide technical skill proficiency including a recognized postsecondary credential, which may include an industry-recognized credential or a certificate, or postsecondary credits.[33]

Vermont recognizes two groups of credentials for CTE programs:

1. *Safety and Foundation (Tier 1) Credentials* show that a student can work in hazardous or technical environments without harm to self or others. Every CTE center must have a program of safety for every CTE program, but not every CTE program must include a Tier 1 credential[34]. The AOE Tier 1 Safety and Foundation

[30] https://education.vermont.gov/documents/industry-recognized-credentials-in-vermont
[31] Vermont's Perkins V State Plan, Perkins V Sec. 113 2)(A)(iv)
[32] Perkins V Community of Practice
[33] Perkins V Sec. 3 (5)(a)(ii), Sec. 3 (5)(c), Sec. 113 (b)(2)(A)(iv)
[34] State Board Rule 2378.1

credential list identifies, by program area, the safety credentials that are required and those that are optional.[35]

2. *Postsecondary Industry-Recognized Credentials of Value (Tier 2)* are credentials specific to a career field that are valued by employers, stackable toward further training and education, lead to higher wages or advancement, and are assessed by a third party rather than the program instructor. A Tier 2 credential must meet all four of these criteria in alignment with the Career Cluster associated with the program, as defined by Advance CTE's National Career Clusters Framework which has been adopted by the U.S. Department of Education for Perkins V accountability and reporting purposes. CTE programs must offer state approved postsecondary credentials and/or dual enrollment credit specifically related to the program of study[36]. The AOE maintains the approved postsecondary credential list, accepts applications from state-approved CTE programs to add credentials, and posts the updated list once a year.[37]

Postsecondary industry-recognized credentials meet industry-defined standards, so their content and structure vary across programs of study.

State-approved postsecondary credentials are typically administered or awarded by a third party. Each credentialing body sets its requirements for assessment, accommodations, and credential attainment. These must comply with the Americans with Disabilities Act and Section 504's postsecondary accommodations requirements, but they do not have to comply with IDEA or with secondary education accommodation and modification requirements. Accommodations are often available to support equitable access for multilingual learners or learners with disabilities; however, allowable accommodations vary by credential and credentialing organization. Modifications that change the essential competencies being assessed or the requirements for earning a credential may not be permitted if they would affect the validity or recognition of the credential.

Some postsecondary credentials also have established attendance, training-hour, or other participation requirements that apply to all candidates, regardless of age. These requirements may affect a student's ability to complete a credential and should be considered when determining the credential's appropriateness for a particular program of study and student population.

Conclusion

Focus group participants asked for clearer guidance on the accommodations available to students with IEPs and 504 plans, multilingual learners, and students with extended

[35] https://education.vermont.gov/documents/safety-foundation-tier-1-list
[36] Perkins V Sec. 3 (5)(a)(ii) and (c), Sec. 113 (b)(2)(A)(iv), State Board Rule 2380
[37] https://education.vermont.gov/documents/edu-post-secondary-credentials-tier-2-irc

absences when they sit for credential assessments. Some participants favored a wider range of credentials per program; others noted that fidelity to industry requirements often leaves no range to offer. The Agency of Education's Strategic Plan sets a goal of raising the percentage of graduates with industry credentials by 15 percentage points by 2030, measured from a spring 2027 baseline, and the Agency updates the Tier 2 credential list annually. Where applicable and practical, postsecondary credentials will be considered as an addition to the list when existing credentials may only provide limited accommodations and other relevant postsecondary credentials with more accommodations are available.[38]

3.1c Embedded Academics

This section defines embedded credit and describes how academic content taught in a CTE program becomes credit toward graduation. State Board Rule 2383.3 sets minimum credits by program, and 16 V.S.A. § 1545, as amended by Act 177, and State Board Rule 2388 require schools to honor credits or proficiencies earned in approved programs. Rule 2383.3 predates the Program Proficiency Documents, and each school board determines how credit applies, so practice varies across the state.

Definition

Embedded credit is credit awarded when academic content is taught and applied through the technical competencies of a CTE program rather than through a separate academic course.[39] Students demonstrate proficiency in the academic content through their applied work in the program and earn the specified academic credit based on that demonstrated proficiency and alignment to Vermont State Board of Education approved student standards as part of graduation requirements. Because the wording in statute and State Board Rule does not specify how credit applies, current practice does not follow the rule as written, and correcting this will require a change to statute or rule rather than guidance alone.

Current Practice

Currently, each CTE center identifies and delivers the embedded academic content and determines whether the student has demonstrated it. The sending LEA awards graduation credit. CTE centers and LEAs collaborate on the identification of embedded academic standards, the evidence used to demonstrate them, and the recording of credit on the student's transcript. Current practice results in significant differences in

[38] Agency of Education identified process for reviewing and approving postsecondary credentials, informed by student performance data.
[39] State Board Rule 2383.3

how the same CTE learning, postsecondary credential attainment, and earned postsecondary credits are recognized and applied toward graduation requirements.

State Board Rule 2383.3 outlines specific academic credits to be awarded based on completion of a CTE program. The rule predates the Program Proficiency Documents but sets a minimum for students who complete a CTE program. Perkins V has shifted the focus from program completers to program concentrators[40], defined in Vermont's Perkins V State Plan as students who complete at least one year in a half-day CTE program and at least one semester in a full-day CTE program. How CTE courses can fulfill high school requirements are determined locally. This means that in some districts the same CTE program fulfills core proficiency requirements in a particular subject area and in other districts the same learning only counts as electives[41].

Some high schools ask the CTE center to provide credits in addition to those the center recommends for all students in a given CTE program, aligned with a given student's personalized learning plan and/or credits needed to ensure the student can graduate on time and attend a CTE program.

This variability reflects a broader inconsistency in how districts set and apply graduation requirements. Each district currently determines its own criteria for a diploma, and the Agency's Act 73 report (December 2025) found that local credit requirements range from 16.5 to 28.5 and that rigor and alignment to State Board-approved standards differ from district to district. Because every state-approved CTE program must now meet the same program quality requirements and Perkins V outcomes, the learning across centers is largely consistent; the inconsistency lies in how sending schools apply that learning to their own graduation requirements. Two students who complete the same program with the same instructor and earn the same credentials and college credits can receive different graduation credit, depending on which high school they attend.

Act 177 Section 7 amended 16 V.S.A. § 1545 to refer to "credits or proficiencies" and to require that school boards apply CTE credits toward graduation. The Agency's January 15, 2027 report under Act 177 Sec. 5 will recommend a pre-enforcement intervention pathway, including early-stage mediation between CTE centers and sending districts, that would apply to credit disputes among other matters.

Conclusion

Focus group participants described credit as the least consistent element of the current system. Credit practices differ across centers, across regions, and among schools within the same LEA, and two students from the same high school can receive different credit for the same learning. Half-day and full-day programs may treat embedded credit

[40] Perkins V, Sec. 3 (12), Sec. 113
[41] 2025 Vermont Career and Technical Education Governance and Funding Recommendations Report

differently. Focus group participants recommend that future guidance clearly establish credit expectations for both half and full day models and that staffing expectations for each model are clarified. This guidance is the updated CTE access and credit guidance called for in the 2026–27 Implementation Plan. The State Board is expected to vote on statewide graduation requirements by December 2026.

3.1d Satellite Models

This section defines satellite programs and describes how current rule governs their approval, staffing, and oversight. State Board Rule 2370.17 defines a satellite in one sentence and does not address supervision, liability, support services, or the contents of the agreement between the center and the host site. Satellite arrangements therefore depend on local agreements.

Definition

Under State Board Rule 2370.17, a satellite program is “a technical education program that is offered by a technical center at a site outside the technical center facilities.” While not explicitly articulated in rule, in practice the satellite location may be a high school, a postsecondary institution, an employer or industry facility, or another community location. No other detail or framework is provided, so satellite program arrangements must rely on local agreements to address how staff supervision, student support services, and other key systems are structured and implemented, how liability is shared, and how risks are mitigated.

State Board Rule 2370.6 and 16 V.S.A. § 267 define a collaborative program as one where there are two or more supervisory districts or unions involved in program delivery. However, this term was reportedly not leveraged by practitioners as focus group participants were not aware of its use in any current program delivery.

Satellite Program Approval

A satellite program must be state approved[42], even when it offers the same program content as a program delivered in facilities owned by the CTE center. Satellite programs must meet all of the CTE program requirements articulated in Section 3.1a above[43].

[42] State Board Rule 2380
[43] State Board Rule 2380

Instruction, Staffing, and Facilities at Satellite Sites

The CTE center must employ an appropriately licensed CTE program instructor to teach the satellite program.[44]

The CTE program classroom and laboratory or shop space must be reviewed and approved by Project WorkSafe before students begin instruction.[45]

CTE program classroom and laboratory space must meet the requirements set forth in the Vermont School Construction Planning Guide and Standards for Technical Education Centers (2001). That publication provides the minimum square footage by program for lab, shop, and classroom space, and provides for related storage, support, and office space.

The Agency expects CTE centers and the host satellite site to develop a clearly articulated and comprehensive written agreement, articulating how administrative oversight, instructor supervision and support, student support services, and transportation will be provided. Agreements must detail whether the CTE center will pay for the use of the host site facilities, in a way that aligns with existing provisions for shared costs set forth in State Board Rule 2390.2.

State Board Rule does not specify what the agreement must contain and focus group participants reported agreements break down over challenges in implementation due to collective bargaining agreements, staff capacity, and distance. Some focus group participants reported that in current practice the roles and responsibilities between CTE center and host site can lack consistency and definition, especially around administrative oversight, liability, lab and infrastructure setup, and student belonging. This level of detail is better suited to Agency guidance and procedures than to rule.

Students in Satellite Programs

A student enrolled in a satellite program is a student of the CTE center and is included in the CTE center's full-time equivalent student count[46]. Students enrolled in satellite programs are included in determining if the program and CTE center meet Perkins V accountability and program size, scope, and quality requirements.[47] The student entitlement to enroll in and complete a technical education program under 16 V.S.A. § 1551 and State Board Rule 2371.1 applies to satellite programs. Readiness

[44] State Board Rule 2380.1.I, Vermont Standards Board for Professional Educators Rule 5220.1, 5231.2, 5440-17
[45] https://education.vermont.gov/learning/flexible-pathways/career-technical-education/career-and-technical-education#program-of-study-approval-process
[46] State Board Rule 2370.9
[47] Perkins V Sec. 134 (c)(2)(B)(i)

expectations and admission are the same for a satellite program as for the same program at the center's main site.[48]

Current State Board Rules require that a satellite location must accept students from all sending high schools in the designated CTE service region who apply and are accepted by the CTE center.[49] Student enrollment cannot be limited to students who are enrolled at a satellite high school site.

Satellite Programs and Career-Connected Learning

A course or activity at a high school is a satellite program only when it is part of a CTE center's state-approved program of study and the CTE center is responsible for the elements described in Section 3.1d. Career exploration, applied academic courses, or individual career-related courses offered by a high school on its own are career-connected learning.

Conclusion

Focus group participants noted it is confusing to know when a program counts as a satellite rather than a program located outside the main building. They also noted there can be confusion about who is responsible for responding to immediate student or instructor needs at a satellite location. They reported that given the challenges with implementing agreements that fully address differences in collective bargaining and the sharing of responsibility for staff and student support systems, compounded by the distance from the CTE center. Several satellite programs have opened only to close within two to five school years. Participants also questioned whether a satellite can provide the sense of community students find at the center. Act 177 Sec. 2(2) states the Legislature's intent to deliver programs at sending high schools and in hybrid formats where quality is maintained. The 2026–27 Implementation Plan includes recommended rule changes on program delivery and directs the Agency to consider CTE access in proposed funding approaches.

3.1e Other Definitions Not Included in Act 177

This section defines terms used throughout the guidance that Act 177 did not name. Perkins V, the Vermont Perkins V State Plan, 16 V.S.A. chapter 37, and State Board Rule each supply some of these terms, and the sources do not always agree, as with special populations. Where statute uses a term without defining it, such as the genuine opportunity required under 16 V.S.A. § 1541a, its meaning has been established through local practice. This guidance provides a working definition for these terms, and

[48] State Board Rule 2380
[49] State Board Rule 2372.1

the Agency will recommend that the rule update by June 2027 define them in rule or in Agency procedures.

CTE Participant

A CTE participant is an individual who completes not less than one course in a CTE program or program of study of an eligible recipient[50]. In Vermont, students enrolled in Pre-Tech Exploratory programs and Pre-Tech Foundations courses are counted as CTE participants in federal reporting.[51] Participants also include students who are included in the FTE count for CTE program enrollment but who do not attain concentrator status as defined in Vermont's Perkins V State Plan.[52]

CTE Concentrator

At the secondary level, a CTE concentrator is a student served by an eligible recipient who has completed at least two courses in a single CTE program or program of study[53]. Vermont's State Perkins Plan, approved by the U.S. Department of Education, applies this definition to Vermont's program structure: a concentrator is a student who completes at least one year in a half-day CTE program or at least one semester in a full-day CTE program. The U.S. Department of Education has approved Vermont's use of this definition to meet the federal two-course requirement.

Program Completer

A program completer is defined in State Board Rule as a student who has completed the full approved sequence of a CTE program and has met the program's competency and outcome requirements.[54] A completer satisfies the graduation credit provisions of State Board Rule 2383.3. Perkins V does not define a program completer but instead focuses on program concentrators and their attainment of postsecondary credentials and/or postsecondary credits.[55]

Special Populations

Special populations are defined by Perkins V[56] and include:

- individuals with disabilities

[50] Perkins V Sec. 3 (13)
[51] Perkins V Sec. 113
[52] Perkins V Sec. 113
[53] Perkins V Sec. 3 (12)(a)
[54] State Board Rule 2383
[55] Perkins V Sec. 113
[56] Perkins V Sec. 3 (48)

- individuals from economically disadvantaged families, including low-income youth and adults
- individuals preparing for non-traditional fields
- single parents, including single pregnant women
- out-of-workforce individuals
- English learners
- homeless individuals
- youth who are in, or have aged out of, the foster care system
- youth with a parent who is a member of the armed forces on active duty.

The federal definition applies for purposes of this guidance and for Perkins V planning, services, Perkins V Comprehensive Local Needs Assessment, and for state and federal reporting. Perkins V further requires a gap analysis[57], comparing the performance of each special population category with the overall student population at both the state and regional CTE center level. Where the performance of any special population category is not within 90% of the state or locally negotiated performance for a given target, improvement is required.[58] State Board Rule 2370.20 also defines special populations, based on now outdated federal definitions that were in place in earlier versions of the Perkins legislation.

Career Technical Education Center and Area CTE School

Under Perkins V, an area career and technical education school is a specialized public secondary school used exclusively or principally for providing CTE to individuals preparing to enter the labor market, or the department of a public secondary school used exclusively or principally for providing CTE in not fewer than three fields available to all students, especially in high-skill, high-wage, or in-demand industry sectors or occupations.[59] Vermont's career technical centers are area CTE schools under this definition. A CTE center holds state approval for the CTE programs it delivers[60], including satellite programs under Section 3.1d, and is responsible for the program elements in Section 3.1a.

Current State Board Rule 2372(2)(A) requires state approved CTE centers to offer CTE programs in at least 5 career clusters.

Comprehensive High School

Under 16 V.S.A. § 1522(14), a comprehensive high school is a public or independent school, other than a career technical center, that provides career technical education

[57] Perkins V, Sec. 113 (b)(3)(C)(ii)(II), Sec. 122 (d)(4)(C)(vii) and (d)(11), Sec. 134 (c)(2)(E)
[58] Perkins V, Sec. 123
[59] Perkins V Sec. 3(3)(a) and (b)
[60] State Board Rule 2380

approved under 16 V.S.A. § 1533. A comprehensive high school delivering a state-approved CTE program is responsible for the elements in Section 3.1a for that program. Under Vermont statute, a CTE center is not a comprehensive high school and does not issue diplomas. Students remain enrolled in and graduate from their sending high school. If a CTE center was designated a comprehensive high school, it would become responsible for all state graduation requirements and Education Quality Standards in addition to the Perkins V and State Board Rule requirements for its CTE programs. Focus group participants noted that there is confusion as to whether any Vermont high school that is attached to a regional CTE center would be considered comprehensive high schools. They also noted that it would be helpful to have clarification as to whether CTE centers would need to become comprehensive high schools in order to issue diplomas.

Canaan School's high school is currently approved to offer state approved CTE programs as a comprehensive high school due to its geographic isolation[61]. Missisquoi Valley Union High School currently provides state approved agriculture programs, as it has for over 40 years. Previously, several other high schools were also approved to offer only agriculture programs (Vergennes Union High School, Lake Region Union High School). Those high schools phased out their agriculture programs and agriculture programs are now offered in the regional CTE centers for those regions. St. Johnsbury Academy and Lyndon Institute offer state-approved CTE programs as independent comprehensive high schools.[62]

Sending District

A sending district is a school district that offers public education in grade 11 or 12 and whose students are eligible to enroll in CTE programs at a career technical center.[63] Under 16 V.S.A. § 1541a(a)(1), the school board of a sending district must "provide students enrolled in grades 11 and 12 with a genuine opportunity to participate fully and to benefit from career technical education" including scheduling, transportation, counseling, and the award of credit.

The term "genuine opportunity" is included in statute but not specifically defined. For the purpose of this guidance, genuine opportunity means that when a student shows interest in CTE, school staff support the student in fully exploring the opportunity, including applying to the CTE center and attending if they are accepted.

As State Board Rule 2371 is currently written, sending districts are obligated to pay for students to attend 11th and 12th grade CTE programs, if the student is accepted by the CTE center. Sending districts may agree to pay CTE tuition for 10th grade students who

[61] State Board Rule 2374.1.P
[62] 16 VSA § 1546, State Board Rule 2374.1.M
[63] 16 VSA §1522 (5), 16 VSA §1541a, State Board Rule 2370.18, 2375.8

have the maturity and readiness for CTE programs.[64] Sending districts may, but are not required to, support and pay for student access to Pre-Tech Exploratory programs and Pre-Tech Foundations courses.[65] Focus group participants reported that the sending district's role in this input and decision process varies and that 9th and 10th graders do not always have genuine opportunity to participate in Pre-Tech course or program options.

In current practice, ensuring equitable access to CTE requires coordination among sending districts, CTE centers, and Regional Advisory Boards or Regional Governance Boards. Regional differences in policies, practices, and available resources can create barriers to student participation. When concerns arise, CTE administrators and Regional Advisory Boards are often left to address these barriers. CTE center administrators often work to secure sending district cooperation without the authority to require it.

Eligible Recipient

Under Perkins V, an eligible recipient is a local education agency, area CTE school, or consortium that receives Perkins V funds through the state[66]. In Vermont, career technical centers and comprehensive high schools delivering state-approved CTE programs are included in Perkins V reporting. Canaan Memorial High School and Missisquoi Valley Union High School are not eligible to receive Perkins funding as they do not each offer CTE programs in at least three career clusters with programs that each have at least seven concentrators.

Conclusion

Focus group participants reported that the term "comprehensive high school" is used differently in policy discussions and in practice, and that some apply it to any high school co-located with a CTE center. They asked how independent schools that provide CTE fit within the definition. Act 177 Sec. 6 states the Legislature's intent to move toward a definition that integrates CTE and general education under a single budget. On access, participants reported that the sending district process for 10th grade admission varies by region and that districts have become more cautious about releasing students, citing changes to the funding formula and the Education Quality Standards. CTE administrators address these barriers without the authority to require sending district action to support genuine opportunity for students to participate in CTE. The Agency's January 15, 2027 report under Act 177 Sec. 5 will recommend a pre-enforcement intervention pathway, including early-stage mediation between CTE centers and sending districts.

[64] State Board Rule 2371.2
[65] State Board Rule 2371.4
[66] Perkins V Sec. 3 (21)

3.2 Credit Standards and Competency-Based Pathways

This section defines credit standards and competency-based pathways, two terms that Act 177 names and State Board Rule does not define. 16 V.S.A. § 1545 and State Board Rule 2388 require schools to honor CTE credit, and 16 V.S.A. § 1532(b)(5) directs the State Board to adopt procedures for approving that credit. In practice, the CTE center recommends credit and the sending school decides whether to apply it.

Definitions

A credit standard is the approved mapping of a CTE program's standards to the credits that sending schools apply toward graduation.

The term “competency-based pathway” is not in current use within the CTE system or regulations that guide delivery, monitoring, and reporting under Perkins V or State Board Rule.

The state-approved Proficiency Document for each CTE program is the basis for the course of study in each CTE program area.[67]

The Agency recommends using the term “competency” in place of “proficiency” in CTE rule, guidance, and program documents, to align with the “competency list” language in State Board Rule 2383 and to create a common language between centers and sending schools. 16 V.S.A. § 1545, as amended by Act 177, refers to “credits or proficiencies”, and the Agency will address that language in the rule update due by June 2027.

Current Practice

New statewide graduation requirements are expected to be determined by the State Board of Education by December of 2026. Under current practice, CTE programs are required to align with state-approved Proficiency Documents[68].

CTE centers recommend the credit be awarded by the sending school based on the program content and academic standards completed and the sending school may accept or decline the CTE center’s recommendation. Despite State Board Rule 2388 stating that “credits earned in a state approved technical education program shall be honored by any public school”, in practice, that is not always the case. See Section 3.1c for more information and the unknown impact of the new Act 177 language.

[67] https://education.vermont.gov/learning/flexible-pathways/career-technical-education/career-and-technical-education#program-proficiencies
[68] Career Technical Education Programs | Agency of Education

Conclusion

Focus group participants asked the Agency and the State Board to determine, from the current Proficiency Documents, which academic credits each program earns and to align that determination with the new graduation requirements, so that credit is predictable and transfers when a student moves between centers. The 2026–27 Implementation Plan includes a statewide implementation roadmap for the graduation requirements that addresses credit recognition, and district tools for tracking and awarding credit by June 2027.

3.3 Work-Based Learning

This section defines work-based learning, sets out the WBL sequence in CTE programs, and describes how that sequence aligns with OSHA standards and child labor provisions and hazardous occupations orders under the Fair Labor Standards Act. Perkins V, State Board Rule 2385, and the Fair Labor Standards Act govern WBL in CTE programs. The section also describes work-based learning in high schools under Act 77, which Agency guidance supports but statute and rule do not regulate.

Definition

Work-based learning is sustained interaction with industry or community professionals in real workplace settings, to the extent practicable, or in simulated environments at an educational institution, that fosters in-depth, firsthand engagement with the tasks required in a given career field and that is aligned to curriculum and instruction[69]. Every CTE program includes WBL to expose students to the realities of the occupation for which they are preparing and to apply the academic, workplace, and occupational skills they are acquiring[70], consistent with the applied and work-based learning element in Section 3.1a[71].

CTE centers are required to have a licensed work-based learning coordinator facilitating the WBL placements as part of a CTE program.[72] State Board Rule 2379 outlines this requirement; however, the terminology names this role as co-op coordinator or apprenticeship coordinator.

Types of Work-Based Learning in CTE Programs

Work-Based Learning is a term that can encompass a range of community-, workplace-, and industry-based learning. The Agency outlines the continuum of work-based learning

[69] Perkins V Sec. 3 (55)
[70] State Board Rule 2385.1
[71] Perkins V Sec. 3(5)(b)
[72] State Board Rule 2379.5

activities in the Work-Based Learning Manual[73] from 2025 including: awareness, exploration, preparation, and training.

State Board Rule 2385.1 identifies four types of WBL in technical education programs.

Job shadowing places a student at a work station to observe the business process, for a total of two to eight hours, unpaid. A training plan is optional.[74]

Career work experience (CWE) is a short-term, unpaid career exploration experience in an occupational field related to the student's program or interest. CWE requires a training agreement but not a training plan.[75]

Cooperative technical education (co-op) places a student in a paid work experience at a training station directly related to the student's technical education program[76]. Co-op requires both a training plan and a training agreement. Co-op is cooperative education under Perkins V: a method of education in which, through a written cooperative arrangement between the school and employer, the student receives instruction, including rigorous academic courses and related CTE instruction, by alternating study in school with a job, planned and supervised by the school and employer so that each contributes to the student's education and employability, with work periods and school attendance that may alternate by half days, full days, weeks, or other periods[77].

Student apprenticeship is a state-approved program in which a student is placed in a work experience in accordance with the FLSA[78]. Registered apprenticeship is governed by the U.S. Department of Labor and the Vermont Department of Labor; a student apprenticeship placement follows those requirements in addition to this section.

Work-Based Learning Sequence in CTE

WBL in a CTE program follows the program of study, which progresses in specificity from all aspects of an industry to occupation-specific instruction[79]. The sequence is:

1. Required safety instruction and, if applicable, safety certification, in the state approved CTE program.
2. Job shadowing, where students observe but do not do any hands-on tasks.
3. Career Work Experience (CWE), unpaid experiences that typically fall into the following categories:

[73] https://education.vermont.gov/learning/flexible-pathways/work-based-learning
[74] State Board Rule 2385.1.A
[75] State Board Rule 2385.1.B
[76] State Board Rule 2385.1.C
[77] Perkins V Sec. 3 (10)
[78] State Board Rule 2385.1(D); 2385.3
[79] Perkins V Sec. 3(41)(d)

- Clinical rotations for health sciences or other CTE programs of study where unpaid clinical learning is required for licensure (e.g., licensed nursing assistant exam).
- School and community-based placements that serve as lab placements for students. Students move beyond observation to performing tasks aligned with the key program standards.

4. Co-op and student apprenticeship are paid placements in which the student performs occupational tasks. They occur after the student has demonstrated the program competencies required for the placement and has attained the Tier 1 safety credential required for the program area.[80]

Each program documents its WBL sequence by program year in its approved program materials.

Requirements for Co-op Placements

Every school-approved co-op placement must meet the requirements of State Board Rule 2385.2(B):

- The placement is planned and supervised by the school and employer so the experience contributes to the student's education and employability[81].
- The student must be at least 16 years old, and the placement adheres to U.S. Department of Labor Child Labor Bulletin 101 (non-agricultural) or 102 (agricultural).
- All local, state, and federal wage and hour laws are followed.
- The student is covered by workers' compensation or comparable individual, school, or employer insurance while on the job.
- A completed training agreement signed by the student, the student's parent/guardian, the CTE work-based learning coordinator, and the employer is on file at the school.
- The CTE work-based learning coordinator visits the student regularly at the work site to assess progress.
- The student receives an educational program addressing core technical competencies and job-seeking and job-keeping skills.
- The student is eligible for graduation credit on successful completion of a co-op that is part of a state-approved CTE program.
    - In current practice, this means that the technical and professional skills a student is developing in the co-op placement are clearly defined in the

[80] Agency of Education Guidance, aligned with State Board Rule 2375, and 29 CFR 520.500
[81] Perkins V Sec. 3(10)(a)

training plan. Focus group participants reported that credit awarded varies for students participating in co-op as part of their CTE program.

Hazardous Occupations and the Student-Learner Exemption

The FLSA child labor provisions and the hazardous occupations orders issued under them[82] prohibit the employment of minors under 18 in occupations the Secretary of Labor has declared hazardous. Certain hazardous occupations orders include a student-learner exemption that permits a 16- or 17-year-old enrolled in a course of study in a cooperative vocational training program to perform otherwise prohibited work under set conditions.[83] The exemption applies only where the student is enrolled in a state approved program; the work is incidental to the training, intermittent, and for short periods; the work is performed under the direct and close supervision of a qualified and experienced person; safety instruction is given by the school and correlated by the employer with on-the-job training; and a schedule of organized and progressive work processes is on file in a written agreement signed by the employer and the school.[84]

The Agency expects a student to be placed in tasks covered by a hazardous occupations order only when the student is a CTE concentrator as defined in Section 3.1e, has completed the program's safety instruction and attained the required Tier 1 safety credentials, has demonstrated the program competencies the placement requires, and has a training plan and training agreement on file that meet the conditions of the student-learner exemption[85]. The training plan identifies the specific hazardous tasks permitted, the supervision provided, and the safety instruction completed. If an activity at a worksite falls under a hazardous occupations order that does not have a student-learner exemption, then CTE students as well as high school students under age 18 in any type of WBL placement are not permitted to do that activity.

OSHA Standards

OSHA standards apply to employers at WBL sites and to the CTE center for its labs, shops, classrooms, and simulated environments. Every CTE center maintains a program of safety for every CTE program[86]. Safety instruction in each program covers the OSHA standards applicable to the occupation, the hazards specific to the program's lab and work settings, and the personal protective equipment required. The CTE work-based learning coordinator confirms, before placement and during site visits, that the employer provides the safety training, supervision, and protective equipment required

[82] 29 C.F.R. Part 570
[83] 29 C.F.R. § 570.50(c)
[84] 29 C.F.R. § 570.50(c)
[85] Agency of Education Guidance, aligned with State Board Rule 2375, and 29 CFR 520.500
[86] State Board Rule 2378.1

by OSHA standards and the training agreement. Where a site does not meet those requirements, the student is not placed or is removed from the placement. [87]

Roles for WBL Placements for CTE Students

The CTE center is responsible for the WBL sequence, safety instruction, safety credentials, training plans and agreements, site visits, and the determination that a student meets the conditions for a hazardous occupations placement. The employer is responsible for compliance with OSHA standards, FLSA wage and hour and child labor provisions, and the supervision set out in the training agreement, including all hazardous occupations provisions. The sending LEA provides scheduling that allows the CTE student to participate, consistent with Section 3.1e, and applies credit as part of the CTE program as outlined in Section 3.2. Placements that include hazardous components may only be made by the CTE center, and not by the high school.[88]

Work-Based Learning in High Schools

Act 77 (2013) articulated work-based learning as one part of flexible pathways for learners in Vermont, broadening its role beyond the CTE context in which it had traditionally been used. In 2015, Vermont created a dedicated Work-Based Learning Coordinator endorsement.[89] All CTE work-based learning or co-op coordinators must hold this endorsement, and all CTE centers are required to employ a work-based learning or co-op coordinator[90]. In 2017, the Agency released the first edition of the Work-Based Learning Manual to provide guidance to the field, in particular to non-CTE high school settings, for the implementation of work-based learning in alignment with Act 77.

Based on the 2017 guidance, in Vermont work-based learning (WBL) is the term currently used to describe opportunities for students to explore career pathways and connect academic learning to real-world applications, in both the CTE and high school settings, and can even apply to elementary or middle school. In addition to work-based learning, some high schools or districts may use the term community-based learning to describe similar activities.

The Agency's WBL guidance describes standards intended to support safe, meaningful, and well-coordinated experiences, including coordination by a licensed WBL Coordinator and compliance with applicable legal, health, and safety requirements.[91] However, the existence of these standards does not establish a corresponding

[87] Agency of Education Guidance, aligned with the Fair Labor Standards Act
[88] Fair Labor Standards Act - 29 CFR 570.50
[89] Vermont Standards Board for Professional Educators Rule 5440-60
[90] State Board Rule 2379.5
[91] https://education.vermont.gov/learning/flexible-pathways/work-based-learning

monitoring or enforcement process for high school WBL placements outside CTE. The Agency does not currently regulate or enforce these placements, and the structures supporting coordination and compliance vary across schools and districts.

As evidenced by the extensive regulation and structures outlined in the prior sections, the requirements and monitoring for CTE WBL placements are rigorous, consistent, tied to both state and federal monitoring and funding, and coordinated by a licensed WBL or co-op coordinator.

In contrast, WBL can also describe career awareness and exploration activities that we might see in lower grades and throughout high school such as: aptitude assessments, career fairs, guest speakers, informational interviews, or job shadows.

The Work-Based Learning Continuum provides a visual of the variety of career-oriented learning activities encompassed by the current term “work-based learning” in Vermont. Vermont's Work-Based Learning Manual provides resources for understanding the range of experiences and levels of engagement that support students' career development.

Conclusion

Focus group participants reported that high school placements made without a licensed work-based learning coordinator or training plan may not meet Fair Labor Standards Act (FLSA) requirements, which creates liability for both the employer and the district. Smaller LEAs struggle to hire a full-time WBL coordinator, and the high school setting lacks a clear definition of work-based learning. In particular, having a specific term to describe work-based learning in the CTE versus career-connected learning in the high school setting could facilitate smoother communication and understanding. One participant noted that many CTE students pursue careers outside their program field and stated that high schools should have clearer defined options to support career pathways under Act 77. The Strategic Plan commits the Agency to strengthening expectations, tools, and monitoring for work-based learning. The Agency’s January 15, 2027 report will include recommendations on CTE educator endorsements and on Flexible Pathways.

3.4 Safety Standards

This section sets out the minimum safety, space, and equipment standards for CTE programs. State Board Rules 2377 and 2378.1 govern safety, the 2001 Vermont School Construction Planning Guide and Standards for Technical Education Centers governs space, and the Perkins V Comprehensive Local Needs Assessment and State Board Rule 2380 govern equipment. Perkins V does not establish facility standards.

Every CTE center maintains a program of safety for every CTE program.[92] The program of safety covers the OSHA standards applicable to the occupation taught, the hazards specific to the program's lab, shop, clinical, or field settings, the personal protective equipment required, emergency procedures, and the safety instruction and safety credentials that students complete before using hazardous equipment or entering hazardous settings, consistent with Section 3.3.

Under State Board Rule 2377.3, a school offering state approved technical education programs must schedule a review conducted by Vermont Department of Labor's Project WorkSafe at least once every five years. The Agency of Education also requires Project WorkSafe review and approval of all new CTE program instructional spaces before the program has students present for instruction. Between Project WorkSafe visits, the Agency expects the CTE center or high school to conduct its own periodic inspection of each program's instructional space and equipment against the program of safety and the applicable OSHA standards and corrects deficiencies before the affected space or equipment is used for instruction.[93]

Satellite sites defined under Section 3.1d must meet the same safety standards as the center's main facility.[94] A Project WorkSafe visit is required before initial instruction begins, the CTE center must conduct the required continuous periodic inspection noted above and must include the satellite site in the five-year safety review under Rule 2377.3.

Space Standards

Instructional space for each CTE program meets the size requirements in the Vermont School Construction Planning Guide and Standards for Technical Education Centers (2001). That publication sets minimum square footage by program type for lab, shop, and classroom space, and provides for related storage, support, and office space. The Agency of Education uses these provisions when conducting monitoring and compliance reviews and when approving new CTE program instructional space. The specific requirements are found on pages 16 and 17 of the Guide.

Equipment Standards

Each CTE program evaluates the adequacy of its program equipment in the Perkins V required Comprehensive Local Needs Assessment.[95] Equipment needs are aligned to technical skill instruction, postsecondary credential attainment, and postsecondary credit instruction. The equipment inventory for a program is sufficient in type, quantity,

[92] State Board Rule 2378.1
[93] Agency of Education Guidance, informed by insurance provider expectations
[94] State Board Rule 2378 and 2380
[95] Perkins V Sec. 134 (c)

and condition for students to demonstrate every competency on the state-approved Proficiencies Document and to prepare for the safety and foundation (Tier 1), and postsecondary (Tier 2) credentials offered. CTE centers must maintain equipment inventory documentation in keeping with state and federal requirements[96].

Equipment is maintained, guarded, and inspected in accordance with the manufacturer's requirements and applicable OSHA standards. The Agency expects that equipment that does not meet those requirements is removed from student use until repaired or replaced.[97] In addition, simulated environments and school-based enterprises used as work-based learning must meet the same equipment standards as the program lab.[98]

Standards in Program Approval and Evaluation

Safety, space, and equipment standards are part of the quality criteria for new program approval under State Board Rule 2380 and part of the five-year comprehensive evaluation under State Board Rules 2377.1 through 2377.4. A new program must demonstrate that its space meets the standard set in the School Construction Planning Guide and Standards for Technical Education Centers (2001), that its equipment meets the equipment standards, and that its program of safety meets the safety standards.

Roles

The CTE center is responsible for the program of safety, the periodic inspection of space and equipment, the safety review under Rule 2377.3, and the equipment inventory for each program. The host site of a satellite program provides space that meets the space standards and allows the center access to confirm compliance. The Agency of Education reviews safety, space, and equipment standards during the program approval process and during monitoring and compliance reviews through Perkins V and/or the comprehensive 5-year evaluation. The Agency collects evidence of safety credentials and assessments in the November 15 data collection and monitors it annually.[99]

Conclusion

Focus group participants did not choose safety standards as a topic of discussion. The Agency currently requires Project WorkSafe review and approval of all new program instructional space before students enroll and, beginning in November 2026, collects

[96] Uniform Guidance, 2 CFR 200.313

[97] Agency of Education Guidance, aligned with OSHA requirements
[98] Agency of Education Guidance, aligned with State Board Rule 2380
[99] Agency of Education CTE Data Reporting Guidance

student safety certifications earned in the first 45 days of the school year to meet insurance provider requirements. The reference in State Board Rule 2377.3 to the Department of Labor and Industry and the 2001 space standards will be among the provisions the Agency recommends updating in the rule changes due to the State Board by June 2027 as established in the Agency's Implementation Plan.

3.5 Data and Reporting

This section describes the data CTE centers submit to the Agency, the reporting calendar, and how the Agency uses those data for Perkins V accountability monitoring and compliance purposes and to meet other state requirements. 16 V.S.A. § 1568, State Board Rule 2389, and Perkins V Sections 113 and 122 establish the requirements. The Agency now relies on the Perkins V definition of special populations in its data collection systems, rather than the outdated definition in State Board Rule.

Reporting Schedule and Submissions Requirements

The Agency of Education (AOE) collects data from regional CTE centers, Canaan Memorial High School, and Missisquoi Valley Union High School throughout the school year. The following reporting calendar outlines required submissions, the data collected at each deadline, and the purposes for which the data is used.

November 15th: Fall Data Submission[100]

- Student enrollment as of October 15th
    - Used to determine full-time equivalent (FTE) enrollments for the semester.
    - The enrollments must be verified by each sending district superintendent, and the superintendent verifications must be uploaded with the data submission.
- *Required by: State*[101]
- Post Program placement data for students who graduated in June of that calendar year
    - The AOE collects in November the placements for students who graduated the previous June.
- *Required by: Perkins V* [102]
- Postsecondary credentials earned by students who graduated in June, after the June 30 data collection, if applicable.
    - For example, a student graduates in June but does not pass the certification examination before graduating. Any credentials earned after

[100] State Board Rule 2389
[101] State Board Rule 2389
[102] Perkins V Sec. 113 (b)(2)(A)(iii)

the June 30 data submission and the November 15 data submission can be reported.
- *Required by: Perkins V* [103]
- Staff information, collected for other AOE reporting purposes relating to tracking and reporting teacher licensure.
- CTE program capacity data
  - Used to identify CTE programs with waiting lists.
  - Collected beginning in November 2025.
- Student safety certifications
  - Safety certifications earned during the first 45 days of the school year.
- Collected beginning in November 2026 to meet CTE center insurance provider requirements and align with safety instructional requirements established in State Board Rule.

April 15th: Spring Data Submission[104]

- Student enrollment as of March 15
  - Used to determine FTE enrollments for the semester.
  - Each sending district superintendent must verify the enrollment data. Superintendent verifications must be uploaded with the data submission.
- *Requirement: State.*[105]
- Updates to the November 15 submission
- Staff changes, student withdrawals, additional safety credentials earned since the November submission.

June 30th: End-of-Year Data Submission

- Student status
  - Verification of graduation status for seniors.
  - Student withdrawals before the end of the school year.
  - *Requirement: to ensure accuracy in federal reporting*
- Perkins V reporting
  - Postsecondary credentials earned by students.
  - Postsecondary credits earned through institutions other than Community College of Vermont and Vermont State University. Credits earned through these institutions are reported to the AOE through other processes.
  - Student participation in work-based learning (WBL).
- *Required by: Perkins V*[106]

[103] Perkins V Sec. 113 (b)(2)(A)(iv)
[104] State Board Rule 2389
[105] State Board Rule 2389
[106] Perkins Sec. 113 (b)(2)(A)(iv)

Additional Perkins V Reporting and Data Validation

The AOE uses data-matching systems to collect additional information needed for Perkins V reporting[107], including:

- Academic proficiency in reading/language arts, mathematics, and science.
- Four-year graduation rates.
- Nontraditional concentrators.

Following the June 30 data submission, the AOE validates the submitted data and returns it to CTE centers for further review and validation. This process typically occurs in late fall of the calendar year following the June submission.

Enrollment Reporting

Enrollment counts for technical education funding are reported under State Board Rule 2389 as follows.

- A student attending a state-approved technical education program or a Pre-Tech Exploratory program is counted when the student attends at least an average of 80 minutes a day each week.
- Minutes of attendance are reported, and FTE is calculated on the basis of one FTE equaling an average of 240 minutes of enrollment per day, consistent with State Board Rule 2370.9.
- No student is counted as more than one FTE.
- Only attendance in the technical education program's course of study[108] is reported; enrollment in other courses is not.
- A student enrolled in a state-approved Pre-Tech Foundational program is counted when enrolled at least an average of 40 minutes per day each week (at least 200 minutes per week).

Students in satellite programs under Section 3.1d are reported by the center that holds the program approval, consistent with Section 3.1d.

Data Definitions Used in Reporting

- A CTE participant is reported as defined in Section 3.1e.[109]
- Students in Pre-Tech Exploratory programs and Pre-Tech Foundations courses are reported as participants, not as students in a CTE program or program of study.

[107] Perkins Sec. 113
[108] State Board Rule 2370.8
[109] Perkins V Sec. 3 (13)

- A CTE concentrator is reported as defined in Section 3.1e using the Vermont State Perkins Plan definition approved by the U.S. Department of Education[110].
- Credentials are reported by Tier as defined in Section 3.1b, with Tier 2 postsecondary credentials reported for the Perkins V earned postsecondary credential program quality indicator.[111]
- Work-based learning is reported by type as defined in Section 3.3.[112]
- Special populations are reported using the Perkins V definition as defined in Section 3.1e[113]. The Agency uses data matching to identify some special populations categories, rather than relying on CTE center reporting (e.g., students from economically disadvantaged families).

Consolidated Annual Report

The Agency submits a Consolidated Annual Report (CAR) to the U.S. Department of Education by January 31 for the school year ending the previous June.[114] The CAR includes the following secondary indicators, each calculated by the Agency from center data collections.

- CTE participation, from the November 15 and April 15 submissions.
- CTE concentrators, from the November 15, April 15, and June 30 submissions.
- Four-year graduation rate of concentrators, calculated by the Agency and verified with each center.
- Concentrator academic proficiency in reading/language arts, measured by the WorkKeys Workplace Documents assessment; in mathematics, measured by the WorkKeys Applied Mathematics assessment; and in science, measured by the Vermont Science Assessment.[115]
- Post-program placement, from data centers submit in the November 15 collection for concentrators who graduated the previous June, matched with National Student Clearinghouse data.[116]
- Nontraditional concentrators, from the November 15, April 15, and June 30 submissions.
- Concentrators earning postsecondary credentials, from the June 30 submission; centers may report credentials earned by graduates after June 30 in the following November 15 collection.
- Concentrators earning postsecondary credits, from the June 30 submission and other sources.

[110] Perkins V Sec. 3 (12)
[111] Perkins V Sec. 113
[112] Perkins V Sec. 113
[113] Perkins V Sec. 3 (48)
[114] Perkins V Sec. 113(b)(3)(C)
[115] Vermont Perkins V State Plan
[116] Perkins V Sec. 113

- Concentrator participation in work-based learning, from the June 30 submission.

The Agency disaggregates data for each indicator by gender, race and ethnicity, and each Perkins V special populations category[117]. Centers collect and report the student-level fields needed for that disaggregation.

State Determined Performance Levels

The Agency establishes state determined levels of performance for each indicator in Section 3.5[118]. Each year the Agency uses the two most current years of data to set the levels for the following school year; the levels must show continuous improvement using processes set forth in Vermont's Perkins V State Plan. Perkins V requires that the Agency include stakeholder engagement and a public comment period when setting the state determined performance levels for the upcoming school year.[119] The Agency reports the state determined levels of performance for the upcoming school year in its annual Perkins State Plan report to the U.S. Department of Education, due April 30. The U.S. Department of Education then must approve the state's determined performance levels.

Local Levels of Performance

Perkins eligible grant recipients must annually negotiate performance measures with the Agency of Education.[120] This means that Perkins grant recipients must either accept the state determined performance levels or negotiate local performance levels with the Agency of Education each year.

Perkins V requires that the performance measures be based on the two most recent years of institution level performance data for each of nine performance measures.[121] The Agency, as required by Perkins V, determines the two-year average, and then negotiates performance measures that meet the requirements for continuous improvement set forth in Perkins V. Negotiated targets are shared by memo with each eligible recipient at the conclusion of the negotiation process.

Disparities and Gaps in Performance

The Agency addresses disparities or gaps in performance among student groups in its Perkins Consolidated Annual Report[122]. Where no meaningful progress has been made in closing a gap, the Agency describes the additional actions it will take to show the

[117] Perkins V Sec. 113 (b)(3)(C)(ii)
[118] Perkins V Sec. 113 (b)(3)
[119] Perkins V Sec. 113 (b)(3)(A)(i)(III)
[120] Perkins V Sec. 123 (b)
[121] Perkins V Sec. 113 and Sec. 123 (b)
[122] Perkins V Sec. 122

improvement in performance that the law requires.[123] Eligible recipients use their disaggregated data under the Consolidated Annual Report to identify gaps at the program level and address them in their Perkins V Comprehensive Local Needs Assessments (CLNAs) and annual grant applications.[124] Centers report the data needed for the Agency to meet this requirement for every program, including satellite programs.

Roles

CTE centers submit enrollment, financial, and outcome data on the November 15, April 15, and June 30 schedules; maintain separate financial accounts under 16 V.S.A. § 1568(a); verify graduation rate data; and report credentials, postsecondary credits, work-based learning, and placement data using the data definitions above.

The Agency calculates center and state performance for each of the Perkins V accountability indicators, disaggregates the data, sets state determined performance levels, negotiates CTE center performance levels, submits the CAR and State Plan report, and addresses performance gaps.

Sending LEAs provide the student-level data the center needs for reporting on their students.

Conclusion

Recent additions to annual reporting include program capacity data to identify programs with waiting lists, and an updated process to collect evidence of safety certification completion within the first 45 days of the school year. Data and reporting were not a focus group topic. While clearly articulated goals and measures for postsecondary credential and credit attainment are already included in the Vermont Perkins State Plan, the Agency will establish spring 2027 baselines for both as for the Strategic Plan goals. The January 15, 2027 report under Act 177 Sec. 5(3)(D) will include an analysis of data collection system capabilities and gaps related to flexible pathways, personalized learning plans, and college and career readiness. Alignment of the reporting definitions across State Board Rule and Perkins V will be part of the rule changes the Agency will submit as part of its Implementation Plan.

3.6 Regional Delivery Models

This section identifies the models through which a region may deliver state-approved CTE programs, as Act 177 Sec. 3(6) requires. Vermont statute and State Board Rule permit a career technical center, a comprehensive high school, or a satellite site to offer a CTE program. Neither source describes delivery models as a category, establishes

[123] Perkins V Sec. 123
[124] Perkins V Sec. 134

criteria for selecting among them, or addresses virtual delivery. Act 177 Sec. 2(2) states the Legislature's intent to enable delivery at sending high schools and in hybrid formats where programs maintain quality, industry alignment, and access to facilities. The section names the models that current law allows, describes where each is in use, and states the requirements that apply under every model.

Definitions

Differentiated delivery model. Where, and by whom, a state approved CTE program is delivered. Vermont statute and rule allow a state approved CTE program to be offered by a career technical center, Canaan Memorial High School, or at a satellite site. Act 177 Sec. 3(6) requires "explicit allowance" for differentiated models and Sec. 2 directs the system to "enable flexible delivery models, expanding beyond regional technical centers." High schools can offer CTE content that does not duplicate CTE center programs and must coordinate with CTE Regional Advisory Boards to prevent duplication.

A region may deliver state-approved CTE programs through any of the following models, alone or in combination.

Center-based delivery. The program is delivered at the career technical center's main facility, with students traveling from sending schools. This is the model under which most Vermont CTE programs currently operate.

- Currently, state-approved CTE programs exist only at the 17 regional CTE centers[125], at Canaan Memorial High School, and at Missisquoi Valley Union High School.
- Under State Board Rule, St. Johnsbury Academy and Lyndon Institute offer state approved CTE programs and are considered regional CTE centers.[126]

Satellite delivery. The center delivers all or part of a program at a high school, postsecondary institution, or employer facility. The CTE center maintains the program approval and is responsible for every program element at the site. See Section 3.1d.

- In current and recent practice:
  - Burlington Technical Center:
    - Operated a Pre-Tech Exploratory program at Champlain Valley Union High School for two years; it is not operating as of July 1, 2026.
  - Patricia Hannaford Career Center:
    - Pre-Tech Foundations courses are taught by CTE center instructors at Vergennes Union High School

[125] State Board Rule 2374
[126] State Board Rule 2374.1.M

- Green Mountain Technology and Career Center:
  - Natural Resources and Forestry Program is located at Hazen Union High School

Comprehensive high school delivery. A public or independent school other than a career technical center delivers a state-approved CTE program.

- Currently, Missisquoi Valley Union High School offers two state-approved CTE agriculture programs.

Employer-based delivery. The center delivers part of the program's sequence at an employer site through cooperative education or student apprenticeship, including alternating schedules of school and work.

Virtual delivery. The CTE center delivers all or part of the program's content in a virtual format to students in their sending region, and any students in the state whose regional CTE center does not offer that program. This is a type of program delivery not currently defined in Rule or Statute.

- River Valley Technical Center is currently piloting two virtual CTE program offerings.[127]

All CTE programs are approved by the Agency under State Board Rule 2380 and evaluated under Rules 2377.1 through 2377.4. Each CTE program delivers its full approved technical skills sequence, embedded academic content, credentials, and work-based learning. A region does not establish a second program of study in the same program area at a second site where the first has capacity, unless the Agency approves it based on regional industry need. Safety, space, and equipment at every delivery site must meet CTE program requirements.

The CTE center or comprehensive high school is responsible for the program under every model.[128] Partner districts, centers, postsecondary institutions, and employers carry the responsibilities set out in the written agreement for the model. Sending LEAs provide the scheduling, transportation, counseling, and credit application that give students access.

Conclusion

Focus group participants asked for student outcome data by delivery model, including for independent schools that deliver CTE, so that the Legislature and the field can compare models on evidence of student outcomes. The Agency's 2025 Vermont Career and Technical Education Governance and Funding Recommendations report, prepared by Augenblick, Palaich and Associates, compared program quality and program cost by

[127] Agency of Education pilot approval, aligned with State Board Rule 2380
[128] State Board Rule 2380

CTE center. The Agency will provide an update in the January 15, 2027 report on how this analysis will become an annual practice. The 2026–27 Implementation Plan directs the Agency to recommend Flexible Pathways updates by March 2027 and to submit recommended rule changes on program delivery to the State Board by June 2027.

Overall Conclusions

Act 177 directed the Agency to describe Vermont's career technical education system as it exists on July 1, 2026, in order to provide clarity to the field before the CTE rules are updated. The sections above show a consistent pattern: the system is governed by Perkins V, Vermont statute, and State Board Rule, and these sources were written at different times for different purposes. This guidance defines "CTE programs," "credentials," "embedded academics," and "satellite models" as Act 177 requires, drawing on Perkins V, statute, and State Board Rule. Other terms that shape daily decisions, including "non-duplicative" and "genuine opportunity," remain undefined in statute and rule, and "comprehensive high school" is defined in statute but applied inconsistently in practice. State Board Rule 2383.3 no longer matches the Program Proficiency Documents. Rule is silent on satellite responsibilities, on work-based learning outside CTE, and on delivery models other than the regional CTE center. Where the sources are silent or inconsistent, practice has been determined locally. Focus group participants described the result as credit that varies by district and even by student, satellite programs that open and close, work-based learning placements at high schools without a coordinator or training plan, and access that depends on where a student lives.

The Agency's Strategic Plan commits to expanding earlier access to high-quality pathways, to consistent recognition of CTE learning, and to stronger expectations and monitoring for work-based learning. The 2026–27 Implementation Plan sets a sequence for this work, and this guidance is its first step. This winter, the Agency is also publishing a current state analysis of career-connected learning, and the State Board is expected to vote on statewide graduation requirements by December 2026. By January 15, 2027, the Agency will report to the General Assembly under Act 177 Sec. 5 on CTE educator endorsements, a pre-enforcement intervention pathway between CTE centers and sending districts, Flexible Pathways and career navigation, and Adult Diploma Program access. By June 2027, the Agency will submit recommended CTE rule changes to the State Board of Education to replace outdated requirements and establish a current framework for program quality, access, delivery, and accountability. The gaps identified in this report, and the input gathered from CTE directors and superintendents through the Act 177 focus groups, will inform each of these steps.

Appendix A: Existing Regulatory and Statutory Requirements

Section 3.1a

Vermont Statute

16 VSA §1521 (b)

"It is further the policy of the state of Vermont that Vermont's career technical education system shall be based on clear standards for student performance and career technical education performance and that achievement of these standards shall be measured on a regular and ongoing basis."

16 VSA §1544

"Subject to any direction as to courses, teachers, or equipment that the State Board may prescribe by rule, high schools may include within their courses of study pretechnical or career technical courses, or both. Before establishing such a program, a high school shall consult with the regional advisory board for its CTE service region."

Act 189 of 2018. An act relating to workforce development.

The Agency of Education shall offer technical assistance to local education agencies to ensure that each high school student has the opportunity to experience meaningful work-based learning when included in the student's personalized learning plan, and that high schools coordinate effectively with regional CTE centers to avoid unnecessary duplication of programs by the centers.

State Board Rules

State Board Rule does not include a definition for **"CTE programs,"** but it does define related terms:

State Board Rule 2370.8: Course of study

"Course of study – means the units of academic, workplace, and occupational skill instruction of a career and technical education program that teach to the approved competency list and an appropriate student organization that supports the program and teaches citizenship and leadership skills."

State Board Rule 2370.9: Full-time equivalent student (FTE)

"Full-time equivalent student (FTE) – means a student who is enrolled an average of at least two hundred and forty minutes per day for a school year in a career and technical education program's course of study.

State Board Rule 2370.6: Collaborative Program

"Collaborative Program – means a technical education program, a number of technical education programs or programs at a technical education center offered pursuant to an agreement between two or more supervisory districts or unions in accordance with 16 VSA §267, for the purpose of cooperatively providing programs and services at a previously negotiated cost."

State Board Rule 2370.14: Pre-tech programs

"Pre-tech programs – means state-approved programs that provide students with preparatory services such as career counseling, academic assessment, applied academic instruction, and introductory career content knowledge and skills to better prepare them to choose and pursue a technical education program."

State Board Rule 2370.26: Technical Education

"Technical Education – means any career and technical education programming designed to teach the academic, workplace, and occupational skills necessary for employment."

State Board Rule 2371.1

Includes that "An individual is entitled to enroll in and complete a technical education program of part-time or full-time duration…" as well as other references to technical education programs. The rules mirror language in Title 16, including 16 VSA §1551.

Other State Board Rules are consistently framed in terms of technical education programs.

State Board Rule 2383 Program Completion

1. Each technical education program shall be based on a competency list approved by the state board. The school shall assess and report student performance on the core competencies of the competency list.

2. Successful Completion:

A student who has been judged competent in 90% of the core competencies has completed the program successfully.

Federal Law (Perkins V)

Perkins V Sec. 3 (5): Career and Technical Education

"The term 'career and technical education' means organized educational activities that –

a. offer a sequence of courses that –
   i. provides individuals with rigorous academic content and relevant technical knowledge and skills needed to prepare for further education and careers in current or emerging professions, which may include high-skill, high-wage, or in-demand industry sectors or occupations, which shall be at the secondary level, aligned with the challenging State academic standards adopted by a State under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965;
   ii. Provides technical skill proficiency or a recognized postsecondary credential, which may include an industry-recognized credential, a certificate, or an associate degree…;
   b. include competency-based, work-based, or other applied learning that supports the development of academic knowledge, higher-order reasoning and problem-solving skills, work attitudes, employability skills, and knowledge of all aspects of an industry, including entrepreneurship, of an individual;
   c. to the extent practicable, coordinate between secondary and postsecondary education programs through programs of study, which may include coordination through articulation agreements, early college, dual or concurrent enrollment program opportunities, or other credit transfer agreements that provide postsecondary credit or advanced standing; and
   d. may include career exploration at the high school level or as early as the middle grades (as such term is defined in section 8101 of the Elementary and Secondary Education Act of 1965.)"

Perkins V Sec. 3 (41): Program of Study

"PROGRAM OF STUDY … means a coordinated, non-duplicative sequence of academic and technical content at the secondary and postsecondary level that –

a. incorporates challenging State academic standards, including those adopted by a State under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965;

b. addresses both academic and technical knowledge and skills, including employability skills;

c. is aligned with the needs of industries in the economy of the State, region, Tribal community, or local area;

d. progresses in specificity (beginning with all aspects of an industry or career cluster and leading to more occupation-specific instruction);

e. has multiple entry and exit points that incorporate credentialing; and

f. culminates in the attainment of a recognized postsecondary credential."

Section 3.1b

State Board Rules

"Credentials" is not included in the definitions in State Board Rules.

State Board Rule 2380: Quality Criteria for Technical Education Programs and New Program Approval

"1. A technical education program shall meet the following criteria in order to receive state approval: D. The program prepares students for one or more industry recognized credentials upon the completion of the program and/or is articulated with a postsecondary program that offers such a credential"

Federal Law (Perkins V)

Perkins V requires states to define and adopt a list of approved postsecondary credentials.

Section 3.1c

State Board Rules

State Board Rule 2383.3: Academic Credit

"Academic Credit: Students who successfully complete a technical education program shall satisfy state graduation requirements as set forth below:

A student who successfully completes one of the technical education programs listed below shall receive one credit in science toward graduation: (programs then listed)

- Same language but for one credit in mathematics, with a list of programs
- Same language but for Art
- Same language but for English
- Same language but for Social Studies (and explicitly not to include US History or World History)

"A technical education program may have more than one embedded academic credit if the state board determines that the program content justifies it."

State Board Rule 2383.3.H

Includes that "Nothing herein shall preclude a school board from granting additional academic credit for learning acquired in a technical education program."

Act 177 of 2026

(a) Credits or proficiencies and grades earned in a course offered within a CTE program approved by the State Board shall not be altered by any public school or approved or recognized independent school in Vermont and shall be applied by the school toward any State graduation requirements in accordance with rules adopted by the State Board. Any State Board rules regarding earning of credits or proficiencies shall allow flexibility with respect to the integration of CTE education and other academic courses.

(b) The credits or proficiencies earned for a career technical education program approved by the State Board shall be honored by any public or independent school within Vermont.

Section 3.1d

State Board Rules

State Board Rule 2370.17: Satellite program

Satellite program – is a technical education program that is offered by a technical center at a site outside the technical center facilities.

Section 3.1e

Federal Law (Perkins V): Purpose

Overarching framing of Perkins V

"The purpose of this Act is to develop more fully the academic knowledge and technical and employability skills of secondary education students… who elect to enroll in career and technical education programs and programs of study, by –

> (1) Building on the efforts of States and localities to develop challenging academic and technical standards and to assist students in meeting such standards, including preparation for high skill, high wage, or in-demand occupations in current or emerging professions;
>
> (2) promoting the development of services and activities that integrate rigorous and challenging academic and career and technical instruction, and that link secondary education and postsecondary education for participating career and technical education students; ….
>
> (5) providing technical assistance that --
>
> (A) promotes leadership, initial preparation, and professional development at the State and local levels; and

(B) improves the quality of career and technical education teachers, faculty, administrators, and counselors…."

State Board Rules

State Board Rule 2370.20: Special Populations

The "Special Populations" definition in State Board Rule 2370.20 is outdated, and could be updated to align with the definition in Perkins V.

State Board Rule 2371: Entitlement to Technical Education

1. An individual is entitled to enroll in and complete a technical education program of part-time or full-time duration if the individual:

A. is at least in the 11th grade in a graded school or is at least 16 in a non-graded situation

B. does not have a high school diploma

C. applies for the program, and

D. meets the admissions criteria set forth in the admissions policies of the technical center and the technical education program and is accepted in the program.

2. A student who is in the 10th grade may with the support of the sending school request admission to a technical center from the school offering the program. The school offering the program can admit the student if there is space available and if it is determined that the student has the maturity to successfully participate in the technical education program and meets admissions criteria.

3. Technical education programs shall not be available to students below age 16 in a non-graded educational setting or below the 10th grade without the prior approval of the Commissioner.

4. Students in the 9th and 10th grades or below the age of 16 in a non-graded educational setting may be enrolled in pre-tech programs at the discretion of their sending school or, in the case of students not enrolled in public education, at the discretion of the school district in which they reside.

5. Students who have completed a technical education program may enroll in additional technical education programming at the discretion of their sending schools if it is judged to best meet their career preparation needs and they are accepted by the technical center or comprehensive high school.

6. Enrollment in a high school shall not be a precondition for a student without a diploma to enroll in a technical education center. When a student who is not enrolled in a

secondary school applies directly to and is accepted by a technical center, the school district of residence shall be notified within 10 days of acceptance. Funding for this enrollment shall be in accordance with existing statute.

7. The technical center shall provide program information to potential students within its region listing admissions requirements, employment opportunities, and other relevant information to assist the student in making a decision to enroll. Sending schools shall provide a reasonable opportunity for technical centers and comprehensive high schools to inform students in grades 7 through 12 of the educational opportunities available to them in the region.

8. A student's regular high school schedule or program shall be adjusted as necessary to ensure that there are not barriers to enrolling in a technical education program. Graduation requirements in excess of state minimum requirements shall be adjusted when, through no fault of the student, they present a barrier to enrollment in the technical education program of the student's choice.

State Board Rule 2372.2A: Area Technical Centers

The state board may designate a school site as a technical center when the proposed center: A. offers state-approved secondary technical education programs in no fewer than five of the following career clusters beginning at the eleventh grade level.

Vermont Statute

16 VSA §1522 (14): Comprehensive high school

16 VSA §1522 (14) includes "'Comprehensive high school' means a public or independent school other than a career technical center that provides career technical education approved under section 1533 of this title."

16 VSA §1541a (a)

"A school board of a sending district that offers public education in grade 11 or 12 shall: (1) Provide students enrolled in grades 11 and 12 with a genuine opportunity to participate fully and to benefit from career technical education."

Federal Law (Perkins V): Definitions

Perkins V Sec. 3 (3): Area Career and Technical Education School

"AREA CAREER AND TECHNICAL EDUCATION SCHOOL." – The term 'area career and technical education school' means –

a. a specialized public secondary school used exclusively or principally for the provision of career and technical education to individuals who are available for study in preparation for entering the labor market;

b. the department of a public secondary school exclusively or principally used for providing career and technical education in not fewer than 3 different fields that are available to all students, especially in high-skill, high-wage, or in-demand industry sectors or occupations…."

Perkins V Sec. 3 (12): CTE Concentrator

"CTE CONCENTRATOR" is defined: "a. at the secondary school level, a student served by an eligible recipient who has completed at least 2 courses in a single career and technical education program or program of study…"

Perkins V Sec. 3 (13): CTE Participant

"CTE PARTICIPANT" "means an individual who completes not less than one course in a career and technical education program or program of study of an eligible recipient."

Vermont State Perkins Plan

Concentrator definition

In Vermont's State Perkins Plan, required and approved by the US Department of Education, a concentrator is defined as a student who completes at least one year in a half-day CTE program or at least one semester in a full day CTE program.

Pre-Tech programs in federal reporting

Pre-Tech Exploratory programs and Pre-Tech Foundations courses are not included in the federal definition of a CTE program or program of study. Students in these offerings are counted as CTE participants in federal reporting.

Section 3.2

Credit standards and competency-based pathways are not defined in State Board Rule.

Vermont Statute: Credits and Grades

16 VSA §1545: Credits and grades earned

"(a) Grades earned in a course offered within a CTE program approved by the State Board shall not be altered by any public school or approved or recognized independent school in Vermont and shall be applied by the school toward any State graduation

requirements in accordance with rules adopted by the State Board. Any State Board rules regarding earning of credits shall allow flexibility with respect to the integration of CTE education and other academic courses."

(b) "The credits earned for a career technical education program approved by the State Board shall be honored by any public or independent school within Vermont. If necessary to enable a student to participate in career technical education and graduate with his or her class, the credits earned shall be applied toward any school district or independent school graduation requirements exceeding the minimum number of credits required by the State Board. The school board of the high school from which the student wishes to graduate shall make a determination as to whether the credits shall be applied toward graduation requirements. A decision of a school board may be appealed to the Secretary who shall construe this section to favor participation in career technical education."

16 VSA §1532(b)(1)

"The following shall be adopted by procedure or rule: Competencies that graduates of each kind of career technical education program should be able to demonstrate, including career technical competencies necessary for the student's intended employment."

16 VSA §1532(b)(5)

"The following shall be adopted by procedure or rule: procedures by which the Secretary will review and approve course of study credits in career technical education to meet State graduation requirements."

State Board Rules: Credits and Graduation

State Board Rule 2380

Sets forth Quality Criteria for Technical Education Programs and New Program Approval.

State Board Rule 2388: Credits and Graduation Requirements

2388.1 "Grades earned in technical education courses shall not be altered by a public or independent school."

2388.2 "School boards shall not establish graduation requirements that have the effect of discouraging or preventing their students from attending technical education programs."

2388.3 "Credits earned in a state approved technical education program shall be honored by any public school in Vermont and applied toward any state and local

graduation requirements in accordance with policies adopted by the school board of each school district and in accordance with these rules."

Program Evaluations

16 VSA §1533 and 1534

Set forth criteria for career technical center evaluations and course of study evaluations, to be conducted by the Secretary in coordination with the Vermont Advisory Council on Career Technical Education; specific criteria are included and the State Board "by rule shall prescribe the method for conducting these evaluations."

State Board Rule 2377.1

"School and program evaluations shall satisfy the requirements in 16 VSA §§ 1533 and 1534."

State Board Rule 2377.2

"The commissioner, in consultation with local administrators, shall schedule technical center evaluations so that all schools with state approved technical education programs are evaluated at least every five years."

State Board Rule 2377.4

"Evaluations shall be conducted in a manner and format prescribed by the commissioner."

Flexible Pathways (Act 77 of 2013)

Act 77 of 2013 is codified in 16 VSA Chapter 23.

16 VSA §941 (a)

"There is created within the Agency a Flexible Pathways Initiative…" The only time CTE is mentioned specifically by name is in 16 VSA §941 (3) (C) [To create opportunities for secondary students to pursue flexible pathways to graduation that:] "include (i) applied or work-based learning opportunities, including career technical education and internships."

16 VSA §941 (2): Personalized learning plans

The requirement for personalized learning plans, set forth in 16 VSA §941 (2) provides that school districts will "work with every student in grade seven through grade 12 in an ongoing personalized learning process that

(A) identifies the student's emerging abilities, aptitude, and disposition; …

(C) guides decisions regarding course offerings and other high-quality educational experiences;" and

(D) identifies career and postsecondary planning options using resources provided pursuant to subdivision (4) of this subsection (b)."

16 VSA §941 (4)

"To provide students, beginning not later than grade seven, with career development and postsecondary planning resources to ensure that they are able to take full advantage of the opportunities available within the flexible pathways to graduation and to achieve their career and postsecondary education and training goals. Resources provided pursuant to this subdivision shall include information regarding the admissions process and requirements necessary to proceed with any and all military-related opportunities."

16 VSA §942 (9): Flexible pathways to graduation

"'Flexible pathways to graduation' means any combination of high-quality academic and experiential components leading to secondary school completion and postsecondary readiness, which may include assessments that allow the students to apply his or her knowledge and skills to tasks that are of interest to that student."

16 VSA §942 (11): Postsecondary planning

"'Postsecondary planning' means the identification of education and training programs after high school that meet a student's academic, vocational, financial, and social needs and the identification of financial assistance available for those programs."

16 VSA §942 (12): Postsecondary readiness

"'Postsecondary readiness' means the ability to enter the workforce or to pursue postsecondary education or training without the need for remediation."

Section 3.3

State Board Rules

State Board Rule 2385: Work-based Learning

1. Types of Work-based Learning

"Each technical education program shall include work-based learning to expose students to the realities of the occupation for which they are preparing and the

application of academic, workplace and occupational skills they are acquiring in programs.

Work-based learning may include:

A. Job Shadowing which is the placement of a student in a work station where the student observes the business process. The time span is a total of two to eight hours and it is an unpaid situation where training plans are optional.

B. Career Work Experience (CWE) which is short term unpaid career exploration experiences in an occupational field related to a student's program or interest. CWE is a non-paid situation and requires a training agreement but not a training plan.

C. Cooperative Technical Education (CTE) in which students are placed in paid work experiences at training stations directly related to their technical education program. A training plan and a training agreement are required.

D. Student apprenticeship which is a state-approved program and in which students are placed in a work experience in accordance with the federal Fair Labor Standards Act.

2. Cooperative Work Experience

A. Technical education students shall be eligible as part of their technical education program to participate in cooperative technical education hereinafter referred to as "co-op."

B. All school-approved Co-op placements shall meet the following requirements:

(1) Each placement shall be planned and supervised by the school and employer so the experience contributes to the student's education and employability.

(2) The minimum age of students placed shall be 16. Student placements shall adhere to Child Labor Bulletin #101 and/or 102 (Child Labor Requirements in Non-Agricultural/Agricultural Occupation Under the Fair Labor Standards Act, 1977),

(3) All local, state, and federal laws applying to wage and hour regulations shall be followed,

(4) Students shall be covered by Workers' Compensation or comparable individual, school, or employer insurance while on the job,

(5) Students shall have on file at the school a properly completed training agreement, signed by the student, the student's parent, the co-op coordinator and the employer,

(6) Students shall be visited regularly at the work site by the co-op coordinator to assess student progress,

(7) Students shall receive an educational program that addresses core technical competencies and tasks directly related to job-seeking and job-keeping skills, and

(8) Students shall be eligible to receive credit toward graduation upon successful completion of approved co-op programs when it is part of a state-approved course of study in technical education."

State Board Rule 2385.3: Student Apprenticeship

There are also provisions for Student Apprenticeship, which are rarely used in practice.

State Board Rule 2389.5: Student Apprenticeship

5. Each school board operating a technical education center shall employ a licensed cooperative education/student apprenticeship coordinator to develop and oversee work-based learning opportunities for students enrolled at the technical center.

Federal Law (Perkins V)

Perkins V Sec. 3 (10): Cooperative Education

"COOPERATIVE EDUCATION – The term 'cooperative education' means a method of education for individuals who, through written cooperative arrangements between a school and employers, receive instruction, including required rigorous and challenging academic courses and related career and technical education instruction, by alternation of study in school with a job in any occupational field, which alternation –

a. shall be planned and supervised by the school and employer so that each contributes to the education and employability of the individual; and

b. may include an arrangement in which work periods and school attendance may be on alternative half days, full days, weeks, or other periods of time in fulfilling the cooperative program."

Perkins V Sec. 3 (55): Work-based Learning

"WORK BASED LEARNING - means sustained interactions with industry or community professionals in real workplace settings, to the extent practicable, or simulated environments at an educational institution that foster in-depth, firsthand engagement with the tasks required in a given career field, that are aligned to curriculum and instruction."

Federal Labor Law

Fair Labor Standards Act (FLSA) Child Labor Provisions and WH-30 Information for Employer - Child Labor Law

Provide the legal framework for ensuring CTE WBL programs align with federal legal requirements. There are some student learner exemptions for some hazardous occupations that only apply to CTE program concentrators who have completed key learning before being placed in WBL.

Section 3.4

Space Standards

BGS 2001 publication

Vermont School Construction Planning Guide (2001)

State Board Rules

State Board Rule 2377.3: Safety review

“A school offering state-approved technical education programs shall schedule a review of safety conditions conducted by the Department of Labor and Industry within the six months leading to” the five year comprehensive evaluation.

Section 3.5

Vermont Statute

16 VSA §1568: Reporting of Information

“(a) Annually, in accordance with a timeline, format, and process established by State Board rule, each CTE center shall report its costs and student enrollment, achievement, and performance measures to the Secretary. CTE center financial accounts shall be kept separately from those of the host high school in accordance with rules adopted by the State Board, which shall clearly delineate relevant costs and revenues.

(b) If a CTE center fails to file financial or student information required under this section within the timelines established by rule of the State Board, the Secretary may withhold funds under this chapter and shall subtract $100.00 per business day from funds due the center under this chapter. The Secretary may waive the $100.00 penalty upon appeal by the center for good cause.”

State Board Rules

State Board Rule 2389: Reporting Requirements for Technical Education

Technical Education Students

Students whose enrollment will be counted for the funding of technical education are those students who attend a state-approved technical education program or a Pre-Tech Exploratory program who attend at least an average of 80 minutes a day each week. Students' minutes of attendance shall be reported and their FTE shall be calculated on the basis of 1 FTE equaling an average of 240 minutes of enrollment each day. No student shall be counted as enrolled in technical education as more than 1 FTE. Only the student's attendance in the technical education program's course of study shall be reported. Enrollment in other course shall not be reported.

Pre-tech Foundational Students

Students who are enrolled for at least an average of 40 minutes per day each week (at least 200 minutes per week) in a state-approved Pre-Tech Foundational program may be reported and counted for technical education funding.

Reporting Periods

On October 15 for the first semester and March 15 for the second semester of each school year, schools that provide state approved technical education programs and pre-tech programs shall record enrollments by program in a format provided by the commissioner. The records shall be submitted by November 15 for the first semester and April 15 for the second semester or the first weekday thereafter if either falls on a weekend."

Federal Law (Perkins V): Consolidated Annual Report

Perkins V Sec. 113 (b) (3) (C): Consolidated Annual Report (CAR)

Perkins V requires that the AOE annually submit a Consolidated Annual Report (CAR) due January 31 for the school year ending the previous June. The Perkins CAR includes 11 specific secondary CTE data reports:

- CTE participation, calculated by the AOE based on the November 15 and April 15 data report submissions.
- CTE concentrators, calculated by the AOE based on the November 15, April 15, and June 30 CTE data collections.
- 4-year graduation rate, calculated by the AOE, verified with each CTE center.
- CTE concentrators' academic proficiency in Reading Language Arts, measured by WorkKeys Workplace Documents assessment, calculated by AOE.

- CTE concentrators' academic proficiency in Mathematics, measured by WorkKeys Applied Mathematics assessment, calculated by AOE.
- CTE concentrators' academic proficiency in Science, measured by the Vermont Science assessment, calculated by AOE.
- Post Program Placement data, with data submitted by CTE centers in the November 15 data collection for concentrators who graduated the previous June, paired with AOE National Clearinghouse data match.
- Nontraditional Concentrator data, calculated by AOE based on November 15 and April 15 data collections.
- CTE Concentrators Earned Postsecondary Credentials, calculated by AOE based on the June 30 data submission. CTE centers can report any credentials earned by graduates after June 30th in the subsequent November 15 data collection.
- CTE Concentrators Earned Postsecondary Credits, calculated by AOE based on multiple data sources, including data reported by CTE centers in the June 30 data collection.
- CTE Concentrators Participation in Work-based Learning, calculated by AOE based on data reported by CTE centers in the June 30 data collection.

Perkins V Sec. 113 (b) (C) (ii): Disaggregated data

The AOE must "disaggregate data for each of the indicators" by gender, race/ethnicity, and all Perkins special populations categories.

Federal Law (Perkins V): Performance Levels

Perkins V Sec. 113 (b) and 113 (b) (3): State determined performance measures

Perkins V also requires the Agency of Education to "establish State determined performance measures for each of the indicators" listed above. Each year, the State must use the two most current years of data to establish the measures of performance for the subsequent school year; the measures must show continuous improvement. There is required stakeholder engagement and a required public comment period. The Agency then submits its state determined levels of performance work in a required Perkins State Plan Report to the US Department of Education, due each year on April 30th.

Local Levels of Performance

Each eligible Perkins recipient (e.g., each CTE center) "shall agree to accept the State determined levels of performance … as local levels of performances, or negotiate with the State to reach agreement on new local levels of performance, for each of the core indicators of performance…. The levels of performance established … shall at a minimum --

(I) be expressed in a percentage or numerical form, consistent with the form expressed in the State determined levels, so as to be objective, quantifiable, and measurable;

(II) require the eligible recipient to continually make meaningful progress toward improving the performance of all CTE concentrators, including subgroups of students…;

(III) … be higher than the average actual performance levels of the previous 2 program years, except in a case in which unanticipated circumstances arise with respect to the eligible recipient and that eligible recipient meets the requirements for revisions under clause (iv);

(IV)… take into account how the local levels of performance compare with the local levels of performance established for other eligible recipients, …; and

(V) set the local levels of performance using valid and reliable data…."

Perkins V Sec. 122: Disparities or gaps in performance

The state is also required to address "disparities or gaps in performance," in our State Plan reports and our CAR reports, and if no meaningful progress has been achieved, a description of the additional actions that will be taken to eliminate disparities or gaps.

Section 3.6

Not currently articulated in state statute or rule.

Vermont Statute

16 VSA §1544

"Subject to any direction as to courses, teachers, or equipment that the State Board may prescribe by rule, high schools may include within their courses of study pretechnical or career technical courses, or both. Before establishing such a program, a high school shall consult with the regional advisory board for its CTE service region."

Act 177 of 2026 Section 2

(2) Enable flexible delivery models, expanding beyond regional technical centers to offer multiple pathways for students to access CTE programming and graduate with required high school courses by:

(A) delivering programs at sending high schools or in a hybrid format where appropriate, provided that program quality, industry alignment, and access to necessary equipment and facilities are maintained; and

(B) utilizing shared resources and technology to improve educational access and limit transportation needs.