

## 65 Ventura County Adult Education Consortium

CONSORTIUM APPROVED

2023-24

### Plans & Goals

#### Executive Summary

The Ventura County Adult Education Consortium (VCAEC) envisions a cooperative and integrated education system of student pathways, ensuring support, equity, and responsiveness to community needs. Its mission revolves around providing crucial programs and services in adult basic and secondary education, English language learning, and career education and training to enable adult learners to acquire the skills needed to excel in life and work.

The VCAEC comprises eight adult schools in Ventura County (Conejo Valley, Fillmore, Moorpark, Ojai, Oxnard Union, Santa Paula, Simi Valley, and Ventura Unified), the Ventura County Office of Education, and the Ventura Community College District. Allocation of resources for the upcoming program year were made based on local needs assessment and effectiveness of the member agencies, adhering to state policies. Throughout the year, the VCAEC will jointly oversee progress and provide support to members, ensuring the successful implementation of proposed strategies or facilitating strategy adjustments in response to shifts in community needs.

Notable accomplishments from the 2022-23 program year include the following:

- **Conejo Valley Adult School** surpassed their enrollment goals for 2022-23 by 199% and celebrated the graduation of the highest number of Adult High School Diploma students in over a decade, at 20 students.
- **Moorpark Adult School** initiated two new Career and Technical Education (CTE) pilot programs in Pharmacy Tech and Culinary Arts and received a California Adult Education Program (CAEP) Model Program award for their innovative Student Referral Program.
- **Ojai Adult School** introduced a new Spanish Language class tailored for the workplace.
- **Oxnard Adult School** has made significant inroads with Oxnard Community College, which will be providing counseling services on the adult school's campus.
- **Simi Institute for Careers and Education (SICE)** continued its successful trend in helping students secure employment in their chosen field, often even before graduation. SICE also increased its outreach to local high school students, promoting itself as a viable option for post-secondary training, resulting in higher enrollment of recent high school graduates for the 2023-2024 academic year.
- **Ventura Adult and Continuing Education (VACE)** achieved exceptional outcomes for their career technical education programs, with completion rates at 94%, placement rates at 97%, and licensure at 100%. Over 50 companies, including six staffing agencies, hired graduates from VACE's CTE programs, and the courses were made accessible through a variety of delivery modes, including in-person, hybrid, or digital platforms. VACE's TDC Studios' students had the unique opportunity to film a promotional video for Vandenberg Space Force, which was later used by FIRST Robotics for an international event. VACE also fostered collaboration among its instructors to create curriculum and pilot the Digital Upskilling Project.

For the upcoming year, the VCAEC will continue to execute on the core focus areas from the previous year, including: 1) enhancing enrollment by leveraging shared marketing strategies or other approaches; 2) broadening the scope and variety of programs and services offered to adult learners, with a particular emphasis on digital literacy; 3) elevating the quality and diversity of collaborations with community partners; 4) augmenting member agency capacity to assist in academic/career planning, monitor student advancement, and facilitate student transitions; and 5) developing or identifying opportunities for professional growth, especially in areas pertaining to equity and access.

#### Regional Planning Overview

The annual planning process drew upon the work undertaken during the three-year planning cycle and in the previous year. This process involved revisiting the three-year plan, then conducting an assessment of data gathered from students, faculty,

staff, and collaborators, as well as considering the plans and priorities of member agencies, which were gathered and discussed during consortium meetings or through process documents generated or shared during the planning process. Analyses of student performance drawn from LaunchBoard / TOPSPro, LMI data provided by the Workforce Development Board, and US Census data were also revisited to help inform strategies included in this annual plan.

## Meeting Regional Needs

### Regional Need #1

#### Gaps in Service / Regional Needs

There is a large gap in the supply and demand for adult education programs and services. The consortium currently enrolls about 2% of the adult ESL population and the population in need of a high school diploma or equivalent, respectively. Likewise, consortium agencies serve between 8% and 14% of those needing short-term career training overall. What is more, staffing changes and declines in enrollment in the more rural areas of the county highlight the need for targeted support and capacity building in these areas.

#### How do you know? What resources did you use to identify these gaps?

Resources used to assess regional needs included demographic and labor market data drawn from the US Census, US Bureau of Labor Statistics, California Adult Education 2021 Fact Sheets, Cal-PASS Plus Adult Education Pipeline, State of California Employment Development Department, WestEd California Regional Education to Workforce Dashboard, the Workforce Development Board of Ventura County, and the Ventura County Civic Alliance. Surveys or structured conversations with member agencies, students, faculty/staff, and community/workforce partners also helped identify the regional need for adult education programs and services.

#### How will you measure effectiveness / progress towards meeting this need?

The VCAEC will continue to monitor financial expenditures captured in NOVA in conjunction with quarterly evaluations of enrollment, retention, and outcomes using data from TOPSPro and LaunchBoard against targets set in the consortium's 2022-25 three year plan. Agencies will strive to support one another in their efforts to promote and implement their local plans, as well as to ideate and develop new and innovative approaches to meeting the academic and career training needs of adults within the region. Member allocations will be adjusted following board policies and state mandates as needed.

## Address Educational Needs

### 2023-24 Strategies

#### Strategy Name

1.1.1 Expand or enhance online/hybrid/distance learning opportunities

#### Activity that Applies to this Strategy

1.1 Expand online/hybrid/distance learning

#### Metrics that Apply to this Activity/Strategy

- All: Number of Adults Served (AE 200 - Overall)
- Progress: Participants with Educational Functioning Levels Gains ABE (AE 400 - ABE)
- Progress: Participants with Educational Functioning Levels Gains ASE (AE 400 - ASE)
- Progress: Participants with Educational Functioning Levels Gains ESL (AE 400 - ESL)
- Success: Participants Who Earn a High School Diploma or Equivalency (AE 633 - Overall)

### Strategy Description

VCAEC schools are persistently expanding their online offerings, including GED, Pharmacy Tech, and ESL classes, along with HyFlex and hybrid CTE courses. Ojai Unified Adult School (OUAS) and Fillmore Adult School will continue to offer an ABS/ASE (High School diploma) in a hybrid setting. SPAS is reviving its high school diploma program. Simi Institute for Careers and Education (SICE) is refining its online curriculum and teaching strategies to optimize online / hybrid instruction, and Ventura Adult and Continuing Education (VACE) will continue to offer flexible learning opportunities while monitoring the balance of online and in-person engagement across hybrid/distance and in-person classes, while also developing a hybrid CTE pathway for its Veterinary Technology Program.

This strategy addresses the CAEP State Priorities of **Technology and Distance Learning, Equity, and Program Development.**

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### Strategy Name

1.1.2 Student resources & supports

### Activity that Applies to this Strategy

1.1 Expand online/hybrid/distance learning

### Metrics that Apply to this Activity/Strategy

- All: Number of Adults Served (AE 200 - Overall)
- Progress: Participants with Educational Functioning Levels Gains ABE (AE 400 - ABE)
- Progress: Participants with Educational Functioning Levels Gains ASE (AE 400 - ASE)
- Progress: Participants with Educational Functioning Levels Gains ESL (AE 400 - ESL)
- Student Barriers: Low Literacy (AE 311 - Overall)
- Success: Participants Who Earn a High School Diploma or Equivalency (AE 633 - Overall)

### Strategy Description

All consortium agencies are committed to supporting their students' technology needs. This includes loaning devices such as laptops and hotspots to students. FUSD will continue loaning laptops to students and have initiated a new policy where they are not distributed until the students have completed 12 or more in-person hours, and CVAE, OAS, MRPK, and VACE will continue to provide resources as practicable.

This strategy addresses the CAEP State Priorities of **Technology and Distance Learning and Equity.**

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### Strategy Name

1.2.1 Expand existing marketing efforts

### Activity that Applies to this Strategy

1.2 Shared marketing / targeted outreach

### Metrics that Apply to this Activity/Strategy

- All: Number of Adults Served (AE 200 - Overall)
- Student Barriers: Low Literacy (AE 311 - Overall)

### Strategy Description

VCAEC agencies will continue discussing opportunities for shared optimization to increase exposure to VCAEC programs and enrollment. VCAEC agencies will also be seeking to hire one or more outside marketing agencies to assist in their marketing

efforts. In addition, agencies are planning to develop a short video leveraging TDC Studios at VACE to highlight offerings available across the consortium.

This strategy addresses the CAEP State Priority **Marketing**.

### Strategy Name

1.3.1 Increase or expand CTE course offerings

### Activity that Applies to this Strategy

1.3 Increase course offerings

### Metrics that Apply to this Activity/Strategy

- All: Number of Adults Served (AE 200 - Overall)
- Progress: Participants with Educational Functioning Levels Gains ABE (AE 400 - ABE)
- Progress: Participants with Educational Functioning Levels Gains ASE (AE 400 - ASE)
- Progress: Participants with Educational Functioning Levels Gains ESL (AE 400 - ESL)
- Student Barriers: Low Literacy (AE 311 - Overall)
- Success: Participants Who Earn a High School Diploma or Equivalency (AE 633 - Overall)
- Success: Participants Who Earn a Postsecondary Credential (AE 625 - Overall)

### Strategy Description

Several adult education institutions are launching new activities to diversify their course offerings. Fillmore Adult School (FUSD) will be looking to engage the community to identify potential CTE courses with high employment potential. Moorpark Adult School (MRPK) is piloting new CTE Culinary Arts and Pharmacy Tech programs for the 2023-2024 academic year. OAS is set to develop life skills and culinary courses, while Oxnard Adult School plans to develop Building/Grounds/Custodial and Paraeducator CTE courses in the coming years. Simi Institute (SICE) plans to launch a construction trade pre-apprenticeship program in Fall 2023. Conejo Valley Adult Education (CVAE) is developing an entrepreneurial pathway for its IET programs, and VACE plans to develop a hybrid Vet Tech pathway and expand IET caregiving courses. Ventura County Office of Education (VCOE) may also re-introduce welding with a new curriculum aligned with AWS certifications post-construction in January 2024.

This strategy addresses the CAEP State Priorities on **Program Development** and **Learner Transition**.

### Strategy Name

1.3.2 Expand offsite / co-located programs

### Activity that Applies to this Strategy

1.3 Increase course offerings

### Metrics that Apply to this Activity/Strategy

- All: Number of Adults Served (AE 200 - Overall)
- Progress: Participants with Educational Functioning Levels Gains ABE (AE 400 - ABE)
- Progress: Participants with Educational Functioning Levels Gains ASE (AE 400 - ASE)
- Progress: Participants with Educational Functioning Levels Gains ESL (AE 400 - ESL)
- Student Barriers: Low Literacy (AE 311 - Overall)
- Success: Participants Who Earn a High School Diploma or Equivalency (AE 633 - Overall)

- Success: Participants Who Earn a Postsecondary Credential (AE 625 - Overall)

### Strategy Description

Oxnard Adult School (OAS) is addressing the need to mitigate transportation challenges through renewed and new MOUs with local entities and nurturing partnerships to offer neighborhood-based courses, including Oxnard College, City of Oxnard Housing Authority, Rio School District, Ocean View School District, City of Camarillo Library, and OUHSD high school campuses. Oxnard has also identified Camarillo High School as a potential ESL site. Santa Paula Adult School (SPAS) is exploring off-site expansion with Limoneira and discussing a potential relocation to Isbell Middle School for a more conducive learning environment. Ventura Adult and Continuing Education (VACE) added evening ESL classes at DATA middle school and the Avenue Adult Center, with plans to relocate classes to Sheridan Way Elementary and partner with VUSD's Extended Learning Opportunities Program to reach more parents of elementary students. Fillmore Adult school will be returning the ELS Citizenship class to the small community of Piru.

This strategy addresses the CAEP State Priorities on **Program Development, Learner Transition, and Equity.**

### Strategy Name

1.3.3 Revive SPAS HSD Program

### Activity that Applies to this Strategy

1.3 Increase course offerings

### Metrics that Apply to this Activity/Strategy

- All: Number of Adults Served (AE 200 - Overall)
- Progress: Participants with Educational Functioning Levels Gains ABE (AE 400 - ABE)
- Progress: Participants with Educational Functioning Levels Gains ASE (AE 400 - ASE)
- Student Barriers: Low Literacy (AE 311 - Overall)
- Success: Participants Who Earn a High School Diploma or Equivalency (AE 633 - Overall)

### Strategy Description

Santa Paula Adult School will revive its high school diploma program starting in the fall of 2023.

This strategy addresses the **Program Development** CAEP State Priority.

### Strategy Name

1.4.1 Digital Upskilling

### Activity that Applies to this Strategy

1.4 Support Digital Upskilling Initiative

### Metrics that Apply to this Activity/Strategy

- Student Barriers: Low Literacy (AE 311 - Overall)

### Strategy Description

Moorpark, Oxnard, and VACE will continue to deliver the Computer Basics course developed by VCOE on behalf of the Ventura County Economic Development Collaborative.

This strategy addresses the CAEP State Priorities of **Program Development, Learner Transition, and Equity.**

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### Strategy Name

1.5.1 Provide targeted support for small school and schools with leadership transitions

### Activity that Applies to this Strategy

1.5 Increase enrollment in Santa Paula / Fillmore

### Metrics that Apply to this Activity/Strategy

- All: Number of Adults Served (AE 200 - Overall)
- Progress: Participants with Educational Functioning Levels Gains ABE (AE 400 - ABE)
- Progress: Participants with Educational Functioning Levels Gains ASE (AE 400 - ASE)
- Progress: Participants with Educational Functioning Levels Gains ESL (AE 400 - ESL)
- Student Barriers: Low Literacy (AE 311 - Overall)
- Success: Participants Who Earn a High School Diploma or Equivalency (AE 633 - Overall)

### Strategy Description

VCAEC leadership will begin meeting regularly with principals and/or superintendents to identify ways to provide assistance in expanding capacity and increasing enrollment. VCAEC will develop a handbook that will assist in onboarding new leadership. Schools will maintain a site handbook that provides all guidance, minutes, and updates for the future administration of the program.

This strategy addresses the CAEP State Priorities on **Leadership and Program Development.**

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### Strategy Name

1.5.2 Community engagement

### Activity that Applies to this Strategy

1.5 Increase enrollment in Santa Paula / Fillmore

### Metrics that Apply to this Activity/Strategy

- All: Number of Adults Served (AE 200 - Overall)
- Progress: Participants with Educational Functioning Levels Gains ABE (AE 400 - ABE)
- Progress: Participants with Educational Functioning Levels Gains ASE (AE 400 - ASE)
- Progress: Participants with Educational Functioning Levels Gains ESL (AE 400 - ESL)
- Student Barriers: Low Literacy (AE 311 - Overall)
- Success: Participants Who Earn a High School Diploma or Equivalency (AE 633 - Overall)

### Strategy Description

Focus groups with Fillmore and Santa Paula students will be conducted to understand better their perspectives on programs offered and ways to mitigate barriers to access. Additionally, FUSD will seek to foster collaboration with its Expanded Learning Opportunities Program (ELOP) and After School Program (ASES) so as to develop mutually beneficial ways to support ESL families and each other. This collaborative effort will lead to the creation of a stronger network of resources, ultimately enhancing programs and providing valuable assistance to the community schools in the area.

**Strategy Name**

1.5.3 Expand capacity to deliver adult education at FAS

**Activity that Applies to this Strategy**

1.5 Increase enrollment in Santa Paula / Fillmore

**Metrics that Apply to this Activity/Strategy**

- All: Number of Adults Served (AE 200 - Overall)
- Student Barriers: Low Literacy (AE 311 - Overall)
- Success: Participants Who Earn a High School Diploma or Equivalency (AE 633 - Overall)

**Strategy Description**

FUSD will be building three new buildings dedicated solely to adult education programs. Additionally, FAS will hire a College and Career Technician to oversee CASAS testing and goal setting and support student performance tracking. To boost engagement and outreach, significant efforts will be made to ramp up advertising and utilize social media platforms, assisted by the College and Career Technician.

This strategy addresses the CAEP State Priorities of **Program Development** and **Learner Transition**.

**Improve Integration of Services & Transitions****2023-24 Strategies****Strategy Name**

2.1.1 Increase visibility / awareness of program offerings across agencies

**Activity that Applies to this Strategy**

2.1 Improve academic or career-planning supports

**Metrics that Apply to this Activity/Strategy**

- All: Number of Adults Served (AE 200 - Overall)
- Student Barriers: Low Literacy (AE 311 - Overall)
- Transition: Participants with Transition to ASE (AE 500 - Overall)
- Transition: Participants with Transition to Postsecondary (CTE) (AE 636 - Overall)

**Strategy Description**

CVAE will continue to encourage student transition through visits to Moorpark College. FUSD will collaborate with the College and Career Technician to run targeted campaigns that highlight the availability and advantages of counseling services, using diverse communication methods such as social media, flyers, and classroom presentations. They also plan to coordinate with college outreach teams for tours and presentations. MUSD plans to foster relationships with Moorpark College, while OUAS intends to capitalize on partnerships both within and outside the district. OAS's academic counselors, along with Oxnard College's counselor, continue to guide students towards higher education and transition into post-secondary education, and they aim to hire a Job Developer/Coach in 2023-2024. SPAS plans to work with United Staffing Associates and Select Staffing, inviting their representatives to interact with their students. SICE will take part in Consortium activities to increase awareness of college and career opportunities. VACE will expand its high school diploma College and Career Seminar course to encourage tours of Ventura and Oxnard Colleges. VACE will also continue to offer their ABE/ESL/ASE students a one-week free preview of CTE program pathways and scholarships to attend VACE's CTE programs.

This strategy addresses the CAEP State Priority of **Program Evaluation** and **Learner Transitions**.

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### Strategy Name

2.1.2 Improve intake, orientation, and data quality

### Activity that Applies to this Strategy

2.1 Improve academic or career-planning supports

### Metrics that Apply to this Activity/Strategy

- All: Number of Adults Served (AE 200 - Overall)
- Student Barriers: Low Literacy (AE 311 - Overall)
- Transition: Participants with Transition to ASE (AE 500 - Overall)
- Transition: Participants with Transition to Postsecondary (CTE) (AE 636 - Overall)

### Strategy Description

Member agencies are undertaking a variety of initiatives to enhance educational outcomes and improve data quality across the consortium, with activities including participating in CASAS training, data team meetings, piloting "preview" days to boost student retention, utilizing career counselors and external support to refine orientation processes, engaging retired staff for support, tracking transitions from technical education to the workforce, and implementing programs to facilitate the transition from ESL to CTE or employment. Additionally, Ojai Adult School will be seeking to improve its capacity for student tracking by implementing a new student information system developed by Moorpark Adult School. Moorpark Adult School will also assist Ojai with implementation.

This strategy addresses the CAEP State Priority of **Program Evaluation**.

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### Strategy Name

2.1.3 Transition supports and bridge program(s)

### Activity that Applies to this Strategy

2.1 Improve academic or career-planning supports

### Metrics that Apply to this Activity/Strategy

- All: Number of Adults Served (AE 200 - Overall)
- Student Barriers: Low Literacy (AE 311 - Overall)
- Transition: Participants with Transition to ASE (AE 500 - Overall)
- Transition: Participants with Transition to Postsecondary (CTE) (AE 636 - Overall)

### Strategy Description

FAS will collaborate with college outreach teams to plan activities that smooth transitions for students. MUSD aims to enhance student transitions by fostering relationships with Moorpark College. OAS academic counselors and an Oxnard College counselor will continue to provide classroom and partner presentations to promote program transitions and higher education. SPAS intends to establish partnerships to aid transition processes starting in fall 2023. As stated in SICE's current CIP report, their school counselor will collaborate with Moorpark College's outreach department to create effective transition pathways. VACE plans to expand its high school diploma College and Career Seminar course to include tours of Ventura and



Oxnard Colleges. VACE will also continue to offer their ABE/ESL/ASE students a one-week free preview of CTE program pathways and scholarships to attend VACE's CTE programs.

This strategy addresses the CAEP State Priorities of **Program Development**, **Learner Transitions**, and **Equity**.

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### Strategy Name

2.2.1 IET / IELCE

### Activity that Applies to this Strategy

2.2 Expand IET/IELCE Learning Opportunities

### Metrics that Apply to this Activity/Strategy

- Progress: Participants with Educational Functioning Levels Gains ABE (AE 400 - ABE)
- Progress: Participants with Educational Functioning Levels Gains ASE (AE 400 - ASE)
- Progress: Participants with Educational Functioning Levels Gains ESL (AE 400 - ESL)
- Student Barriers: Low Literacy (AE 311 - Overall)

### Strategy Description

CVAE is integrating entrepreneurship into its IET/IELC programs, and MUSD is considering the addition of an IET component to its Culinary Arts and Pharmacy Tech programs. OAS plans to extend its IET/IELCE programs in crucial industry sectors, with expansion plans for Medical Assistant, Pharmacy Tech, Business Technology Courses, and the forthcoming Building/Grounds CTE course, all contingent on hiring an ESL teacher amidst a teacher shortage. SICE has launched IET programs in Manufacturing and Business, with further exploration of IET possibilities, possibly in the medical field. VACE is collaborating with a local staffing agency to provide IET classes in caregiving for its clients seeking employment in this field.

This strategy addresses the CAEP State Priorities of **Program Development**, **Learner Transitions**, and **Equity**.

## Improve Effectiveness of Services

### 2023-24 Strategies

#### Strategy Name

3.1.1 Professional development

#### Activity that Applies to this Strategy

3.1 Expand staff professional development

#### Metrics that Apply to this Activity/Strategy

- Student Barriers: Low Literacy (AE 311 - Overall)

#### Strategy Description

Member agencies will continue to participate in professional development opportunities provided by OTAN/CAEP/CASAS, through participation with the VCAEC Data team, and participation in local PLCs. The VCAEC will also be exploring the prospect of holding role-alike convenings for faculty, curricular alignment, and collaboration with VCOE's Teacher Induction program.

This strategy addresses the CAEP State Priority of **Program Evaluation** and **Program Development**.

**Strategy Name**

3.2.1 Diversity / equity / Implicit bias

**Activity that Applies to this Strategy**

3.2 Increase cultural awareness and diversity

**Metrics that Apply to this Activity/Strategy**

- All: Number of Adults Served (AE 200 - Overall)
- Student Barriers: Low Literacy (AE 311 - Overall)

**Strategy Description**

VCAEC agencies strive to ensure all students are welcome and that their staff reflect the populations they serve. Agencies will participate in local or regional professional development opportunities to understand and address issues of implicit bias and promote equity and diversity. Likewise, agencies will seek to incorporate bias and cultural sensitivity into their teacher-driven professional development and PLCs.

This strategy addresses the **Equity** CAEP State Priority.

**Strategy Name**

3.3.1 Improve pre- / post-test scores

**Activity that Applies to this Strategy**

3.3 Improve Data Collection and Analysis

**Metrics that Apply to this Activity/Strategy**

- All: Adults who Became Participants (AE 202 - Overall)
- All: Number of Adults Served (AE 200 - Overall)
- Student Barriers: Low Literacy (AE 311 - Overall)

**Strategy Description**

The VCAEC will continue to hold consortium-wide Data team meetings, help standardize pre & post-testing practices.

This strategy addresses the CAEP State Priority of **Program Evaluation**.

**Fiscal Management**

**A narrative justifying how the planned allocations are consistent with the annual adult education plan which is based on your CAEP 3-year plan.**

The VCAEC board allocates funding to each member agency based on prior year allocations and regular evaluations of expenditures and community needs. Expenditures are reviewed quarterly and funding decisions are made collaboratively following board and state policies. While the VCAEC is a direct-funded consortium, the board also earmarks funds to support shared initiatives and staffing. These funds are held by Ojai Unified School District which serves as the consortium's fiscal banker.

**An approach to incorporating remaining carry-over funds from prior year(s) into strategies planned for 2023-24.**

Strategies identified as part of the three-year and annual plans were designed to help ensure carryover remains at or beneath recommended levels. To minimize the likelihood of excess carryover from year to year, and to ensure AEP funding allocations may be used to achieve the maximum benefit possible for students in the region, the VCAEC reviews member carryover quarterly. Member agencies with annual carryover in excess of 20% following the close of the fiscal year are required to provide a narrative explaining the reason for the carryover and provide a plan and timeline for expending remaining carryover funds for approval by the consortium. Each October the VCAEC Board will review carryover from the previous year and determine if technical assistance will be necessary to help members come in line with the 20% carryover. If a member is not able to develop a plan for the expenditure of carryover funds that are aligned with the approved plan, those funds will be made available for other consortium projects. Within two quarters following the close of the prior fiscal year, agencies will be evaluated for progress made toward approved plans. Agencies with carryover in excess of 50% of their original carryover amount and/or total available AEP funding equal to or greater than 80% of their total annual allocation may be asked to release a proportion of extant carryover funds for use by the Consortium. Any carryover funds that have not been expended or encumbered by the end of the fourth quarter of the following fiscal year will be returned to the Consortium for use in support of shared initiatives or redistribution to consortium members pursuant to policies governing requests for funding and approval.

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