



INDIANA COMMISSION *for* HIGHER EDUCATION

To: Superintendents, Principals, School Counselors, and CTE Directors

From: Anthony Harl, State Director for Career and Technical Education

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Subject: Guidance on Offering CTE Courses through Non-Traditional Delivery Methods

As interest in CTE continues to grow and Indiana prioritizes expanding access to career-related education, more schools are exploring opportunities to deliver CTE courses outside of a traditional classroom or career center setting.

Whether utilizing dual enrollment to complete a credential, offering a youth apprenticeship through an employer-led program, or partnering with a training provider to expand program offerings, providing CTE programming in non-traditional ways can maximize student outcomes. These options are further advanced by Indiana's newly passed [high school graduation requirements](#), which expand flexibility and provide students with additional opportunities to focus on key outcomes prioritized within CTE.

Content for CTE courses can be delivered in a variety of settings, including:

- 1) High school or career center (including dual credit offerings)
- 2) Postsecondary classroom (dual enrollment)
- 3) A third-party training provider
- 4) Employer-led training (including youth or registered apprenticeships)

When evaluating potential delivery models, it is important to consider whether the delivery model may have limitations for the CTE program of study in question. For example, in the case of an employer-led accounting program where on-the-job training is being utilized to cover course standards, it may be difficult to cover certain standards through on-the-job training. However, a student can always complete a course utilizing more than one delivery method of the available options.

Enrolling Students in CTE Program of Study Courses

Students utilizing any of the above methods may be enrolled in secondary CTE program of study courses if:

- All state-approved course standards/competencies are covered.
- A qualified instructor evaluates the student's performance within the CTE course and provides a letter grade.



Additional reminders related to enrolling students in CTE courses are shared below:

- CTE course enrollment funding is not affected by the delivery method the school utilizes to provide the course to a student. All enrollments reported in InTERS (the state's CTE data reporting system) receive the funding level assigned in the annual [CTE funding memo](#) provided that all funding requirements are met.
- Although students in a Career Scholarship Account (CSA) program are not eligible for CTE funding, CSA students should still enroll in relevant CTE courses where applicable. This helps ensure the student meets graduation requirements and CSA funding is allocated correctly. Additional guidance can be found in the [CSA/CTE FAQ document](#).

Qualified Instructor Options for Non-Traditional Delivery

This section discusses options to meet instructor licensing requirements when utilizing non-traditional delivery methods for CTE programming.

- For dual enrollment courses, the postsecondary instructor automatically qualifies as an eligible instructor for the secondary course in which the student is enrolled. The state does not require the postsecondary faculty to obtain a secondary teaching license. However, the faculty member is encouraged to obtain a [school personnel number](#) utilized for course data reporting.
- For courses offered by a training provider, schools should review whether the training provider is on the state's [Eligible Training Provider list](#). Providers on the list qualify as eligible instructors for secondary courses.

For employer-led programs or situations where a training provider is being utilized but is not on the Eligible Training Provider list, there are options to achieve having a qualified instructor below:

- **Qualified Teacher of Record Employed by the School Corporation:** A school can utilize this option in cases where a student is participating in a training program where the school has a licensed instructor, but the student is completing the training through a non-traditional delivery method. For example, a school offers a welding program on-site, but the student is participating in a welding training program through a training provider and not taking the courses at the school. The school's licensed welding instructor can serve as the teacher of record for the student's experience and would be responsible for ensuring competencies are being covered, assessing student learning, and assigning a final grade.
- **Workplace Specialist Training Program:** A school can hire an individual with industry experience who can become a licensed teacher through the Workplace Specialist Training Program. This individual would meet the above requirement of a qualified teacher of record for a program that matches their area of licensure. Further information on workplace specialist licensure can be found [here](#).



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In cases where a school does not have a qualified instructor on staff in the content area of the student's training program or the individual does not wish to go through the Workplace Specialist Program, there are options available to have a trainer (including a supervisor/mentor at an employer) take on the responsibilities of covering the course competencies, assessing student learning, or assigning a final grade. The Unlicensed Vocational Instructor and Adjunct Teacher laws, passed by the Indiana General Assembly to expand flexibility and capacity, allow for an employer trainer to be listed as an instructor.

- **Unlicensed Vocational Program Instructor ([IC 20-28-5-22.1](#))**: This option provides the opportunity for any supervisor or mentor who has met the required work experience hours and obtains an expanded criminal history check to serve as an unlicensed vocational instructor. The required work experience hours listed in statute align with hour requirements for the [Workplace Specialist Training Program](#). This option is often referred to as the 50% rule, as a school corporation can only employ unlicensed vocational instructors for up to 50% of a school corporation's CTE courses.
 - An instructor utilizing this option does not have to be formally employed by the school corporation. The instruction could be done on a voluntary basis or through some other agreement with the school.
 - Assigning a teacher of record at the student's school is still recommended. The teacher of record does not have to be licensed in the content or occupational area of the program. For example, this could be a WBL coordinator.
- **Adjunct Teacher Permit ([IC 20-28-5-27](#))**: This option allows the governing body of a school corporation or the equivalent authority for a charter school to issue an Adjunct Teacher Permit to an individual. The individual must have at least four years of experience in the content area, submit to a criminal background check, and have not been convicted of a felony.
 - Assigning a teacher of record at the student's school is still recommended when utilizing this option. The teacher of record does not have to be licensed in the content or occupational area of the program.

Other Enrollment Options: If a student is participating in a training program that does not directly align to a CTE program of study, other course codes can be used to provide secondary credit for these experiences. These include:

- **Registered Apprenticeship (6148)** – This course code is best utilized to capture a registered apprenticeship in which a student participates that is not aligned to a CTE program of study. The course is funded at \$500.
- **Youth Apprenticeship (6149)** – This newly added course code is best utilized to capture a non-registered apprenticeship in which a student participates that is not aligned to a CTE program of study. This course is funded at \$500.



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- **Career Exploration Internship (CEI) (0530)** – This course code is one of the available WBL courses. The course has no required CTE prerequisites and is funded at \$500. The course does not require hours in the classroom, in addition to the hour requirements for on-the-job training, and the experience must be aligned to the student's career interests.

In cases where a student is in a youth apprenticeship or registered apprenticeship aligned to a CTE program of study, schools are encouraged to still enroll the student in the CTE program of study courses rather than the apprenticeship specific course codes. The school will receive a higher amount of CTE enrollment funding, and the student will earn credit towards concentrator status. Schools can also separately identify in InTERS that the student is taking part in an apprenticeship as part of WBL data collection.

An additional consideration is many non-traditional delivery options may align with the [Career Scholarship Account](#) (CSA) program, which provides additional opportunities for students to participate in high-quality work-based learning (WBL) through employer-led training programs and earn credentials of value. For more information about the CSA program, email CSA@che.in.gov.

Questions regarding this guidance can be shared with the Commission's CTE team at CTE@che.in.gov. Entities are also encouraged to connect with their [Area CTE Director](#) to explore CTE programming options.