Ability to Benefit Action Lab
December 14, 2021
Welcome
Tiffani Williams, ESG
Agenda

1:00 – 1:15pm ET  Welcome
1:15 – 2:00pm ET  Ability to Benefit 101
2:00 – 3:00pm ET  Implementation Exemplars
3:00 – 3:45pm ET  Breakout Discussion: Decision Points and Priorities
3:45 – 4:00pm ET  Summary
Ability to Benefit (ATB) 101

Judy Mortrude, World Education

Introduction: Brenda Dann-Messier, ESG
ABILITY TO BENEFIT 101

Judy Mortrude, World Education, National College Transition Network
ATB Policy Timeline

- **1991**: Students without HSD allowed to receive financial aid if they pass an exam.
- **1992**: New option for student eligibility: through a state-defined process.
- **1995**: ED publishes regulations on state-defined process.
- **2008**: New option for student eligibility: completing 6 credits/equivalent.
- **2012**: ATB eliminated by Congress to reduce costs.
- **2015**: ATB partially restored (reduced Pell amounts) and a unique career pathway program requirement.
- **2016**: Fully restored and career pathway definition aligned with WIOA.
- **2019**: Perkins V CTE career pathway definition aligns with WIOA/HEA and ED hosts national dialogue.
- **2020**: State Processes begin to be approved.
- **2021**: More State Plans Approved. ED negotiated rule-making on state defined plan process pending.
Why Use an Ability to Benefit Strategy?

**Postsecondary Goals**
State postsecondary rates – disaggregated by race

**Equity**
Adult learners served equitably

**Evidenced-Based**
Integrated Education & Training; Career Pathways

**Alignment**
HEA/ WIOA/ Perkins CTE

**Sustainability**
Pell Grant, federal student aid
Progress Toward Postsecondary Educational Goals 2009-2019

https://luminafoundation.org/stronger-nation/report/#/progress
Findings: Barriers for Adult Learners

Time
- Working, some at multiple jobs, and many are raising children
- Lack of time exacerbates perceived and real concerns about limited parking or waiting to see a counselor
- Hard-pressed to fit courses into their schedules, especially when class times are unpredictable term-by-term

Money
- Worried about going into debt and whether additional education will lead to better paying jobs
- Childcare (availability and affordability) is a dominating concern
Findings: Ranking Support Services (continued)

Ranked as most important:

1. Financial aid (50%)
2. Counseling about required courses by degree (41%)
3. Apprenticeships, internships, and other work-based learning opportunities to achieve immediately applicable job skills (37%)
4. Online courses (32%)
5. Food, childcare, or other benefits for student parents (26%)
6. Taking assessments to get credit for what they already know (25%)

7. Tutoring, counseling, or other supports for low-income learners (22%)
8. Professors trained in teaching both high-achieving and low-achieving learners (10%)
9. Enroll directly into transfer-level English and Math without taking a placement test (4%)
10. Resource center for veteran or active duty/reserves military learners (3%)
11. Education for people in prison (3%)
Percent of Population with Less than a High School Diploma

California
Mississippi
Texas
Louisiana
Alabama
Kentucky
New Mexico
Arkansas
Georgia
Nevada
New York
West Virginia
Arizona
North Carolina
Rhode Island
South Carolina
Tennessee
Florida
Indiana
Oklahoma
Delaware
Illinois
Missouri
New Jersey
Virginia
Connecticut
District of Columbia
Idaho
Maryland
Massachusetts
Michigan
Ohio
Oregon
Pennsylvania
Colorado
Kansas
Nevada
South Dakota
Washington
Alaska
Hawaii
Iowa
Maine
North Dakota
Utah
Vermont
Wisconsin
Minnesota
Montana
New Hampshire
Wyoming

At 18% percent California has the highest percentage of adults 25 and older without a high school diploma.

Source: American Community Survey 2013-2017 5-year estimates
Note: Excludes Puerto Rico
Why Dual Enrollment?

Dual enrollment students are more likely to...

- graduate high school
- enroll in college full time
- maintain higher GPAs in college
- persist and complete baccalaureate degrees in four to six years

Positive effects are proportionally greater for students who are first generation and low socioeconomic status

Offsets Opportunity Costs of Learning

Allows an Adult Learner to also be a College Student

◦ With Federal student aid, students can work less and likely be more successful in their education

◦ FT 2021-22 Pell Grant = $6,495  That’s equivalent to working 20 hours per week over 26 weeks at $12 per hour
What is ATB?

ATB is an alternative path to eligibility for Federal student aid for students who do not have a high school diploma or its recognized equivalent.

**First**, a student must fulfill one of these alternatives:

- Pass an independently administered test approved by the U. S. Department of Education.
- Complete a State process approved by the Secretary of Education (“state-defined process”).
- Complete at least 6 credit hours or 225 clock hours that are applicable toward a Title IV-eligible degree or certificate offered by the postsecondary institution.

**Then** the student must be enrolled in an eligible career pathway program.
Student Eligibility

To be eligible for federal student aid, a student must submit a FAFSA and meet all the following (34 CFR 668.32):

- Demonstrate financial need (for most programs);
- Be a U.S. citizen or an eligible noncitizen;
- Have a valid Social Security number;
- Be registered with Selective Service (males);
- Be enrolled or accepted for enrollment as a regular student in an eligible degree or certificate program;
- Maintain satisfactory academic progress;
- Sign the certification statement on the Free Application for Federal Student Aid (FAFSA®), and
- Have a high school diploma or a recognized equivalent;
- Complete a homeschool program; or
- Enroll in a career pathway program and complete one of the “Ability to Benefit” alternatives.
Test Alternative

“The student shall take an independently administered examination and shall achieve a score, specified by the Secretary, demonstrating that such student can benefit from the education or training being offered. Such examination shall be approved by the Secretary on the basis of compliance with such standards for development, administration, and scoring as the Secretary may prescribe in regulations.”
## Approved ATB Tests

<table>
<thead>
<tr>
<th>ATB Test</th>
<th>Passing Scores</th>
<th>Test Publisher Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish Wonderlic Basic Skills Test (Spanish WBST) Verbal Forms VS-1 &amp; VS-2, Quantitative Forms QS-1 &amp; QS-2 Paper and pencil versions and online versions. Effective Date: July 1, 2015</td>
<td>Verbal (200), Quantitative (200)</td>
<td>Association of Classroom Teacher Testers (ACCT), 1187 Coast Village Road, Suite 1, #378, Montecito, CA 93108. Contact: Pablo Buckelew. Telephone: (805) 965-5704. Fax: (805) 965-5807.</td>
</tr>
<tr>
<td>Combined English Language Skills Assessment (CELSA)* Forms 1 and 2 Effective Date: November 1, 2002</td>
<td>CELSA Form 1 (97), CELSA Form 2 (97)</td>
<td>The College Board, 250 Vesey Street, New York, NY 10281. Contact: ACCUPLACER Program. Telephone: (800) 607-5223. Fax: (212) 253-4061.</td>
</tr>
<tr>
<td><strong>ACCUPLACER</strong> Computer-adaptive tests and COMPANION ACCUPLACER Forms J and K: Reading Test, Writing Test, and Arithmetic Test</td>
<td>Reading Test (233),** Writing Test (235),** Arithmetic Test(230)**</td>
<td><strong>ACCUPLACER Computer-adaptive tests and COMPANION TSI Forms T and V: Reading Placement Test, Writing Placement Test, Mathematics Placement Test</strong></td>
</tr>
<tr>
<td><strong>Texas Success Initiative (TSI) Assessment—Computer-adaptive tests and COMPANION TSI Forms T and V: Reading Placement Test, Writing Placement Test, Mathematics Placement Test</strong></td>
<td>Reading Placement Test (336), Writing Placement Test (345), Mathematics Placement Test (326)</td>
<td></td>
</tr>
</tbody>
</table>

*Note: As provided in 34 CFR 668.153(a)(2), the CELSA test is approved as the additional ATB English language proficiency test that must be taken by students whose native language is not English and who are not fluent in English if the academic program includes an ESL component.

** The ACCUPLACER test has been redesigned since it was listed as an approved test in the 2006 notice. TSI is a new addition to the list of approved ATB tests. These tests are provisionally approved. To move from provisional approval to full approval the test publisher must submit additional information as noted in the test agreement signed by the test publisher and the Department, no later than two years from the effective date of the agreement 6/26/2020. In the event the Department denies full approval, we will provide notice of this through publication in the Federal Register, pursuant to 34 CFR 668.150(c)(3).

Credit Alternative

“Completing at least 6 credit hours or 225 clock hours that are applicable toward a Title IV-eligible degree or certificate offered by the postsecondary institution (neither remedial nor developmental coursework count toward this requirement). The coursework must demonstrate that the student has the ability to benefit from the postsecondary program in which the student is enrolled or intends to enroll, but need not be applicable to the specific degree or program in which the student is enrolled.”
“The student shall be determined as having the ability to benefit from the education or training in accordance with such process as the State shall prescribe. Any such process described or approved by a State for the purposes of this section shall be effective 6 months after the date of submission to the Secretary unless he Secretary disapproves such process. In determining whether to approve or disapprove such process, the Secretary shall take into account the effectiveness of such process in enabling students without secondary school diplomas or the equivalent thereof to benefit from the instruction offered by institutions utilizing such process, and shall also take into account the cultural diversity, economic circumstances, and educational preparation of the populations served by the institutions.”
State Process Webinar

- Questions? atbstateprocess@ed.gov
Student Eligibility and the ATB Alternatives

• Students who are eligible under the ATB alternatives are eligible for all Federal student aid programs.

• A student who gained Title IV eligibility under one of the ATB alternatives is considered an ATB student until the student obtains a high school diploma or its recognized equivalent.

• At that time, the student would no longer be subject to restrictions placed on ATB students, including the requirement that the student continue to be enrolled in the eligible career pathway program and the student could enroll in any Title IV eligible postsecondary program and receive Title IV assistance (assuming all other eligibility requirements are met).
Program Eligibility

• A program for ATB must have the seven elements of a career pathway.

• Two of the seven elements focus on adult education & HEA Title IV-eligible postsecondary working together
  – Adult education is defined the same as WIOA
  – Must be designed so students can participate in both components.
A CAREER PATHWAY is a combination of rigorous, high-quality education, training, and other services.

Attributes:
- Industry alignment
- Secondary and postsecondary credential attainment
- Enables entry and advancement in specific occupations or occupational clusters
- Education in the same context as workforce preparation
- Acceleration of educational and career advancement
- Preparation for success in secondary/postsecondary education options and apprenticeships
- Counseling services

A PROGRAM OF STUDY (POS) is a coordinated, nonrepetitive sequence of academic and technical content at the secondary and postsecondary level.

Attributes:
- Industry alignment
- Postsecondary credential
- Multiple entry/exit points
- Academic, technical, employability skills
- Challenging standards
- Progressive content specificity
- Career guidance

Pathways to Career Readiness and Advancement

Programs of Study and Career Pathways share many of the same attributes. The two terms are used interchangeably in many state and local applications. Both are defined in Federal Law.

STACKABLE CREDENTIALS
At these milestones the learner may advance to the next-highest skill job in the sector for which they have trained, and/or continue in or re-enter the learning pathway to pursue additional credentials.

*These stackable credentials may:
- Include preparation for industry certifications.
- Articulate to bachelor's degree programs.
- Be obtainable by HS students through dual credit.

CAREER EXPLORATION
 Begins no later than 8th grade and is an integral part of instruction for:
- Career and Technical Education (CTE)
- Integrated Education and Training (IET)
- Adult Basic Education (ABE)
- Adult Secondary Education (ASE)
- English as a Second Language (ESL)
An Eligible Career Pathway:

… is a combination of rigorous and high quality education, training, and other services that –

A. Aligns with the skill needs of industries in the economy of the state or regional economy involved;

B. Prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeship;

C. Includes counseling to support an individual in achieving the individual’s education and career goals;

Shared definition across 3 federal education laws:
HEA
WIOA
Perkins V
An Eligible Career Pathway:

D. Includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupation cluster;

E. Organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;
An Eligible Career Pathway:

D. Includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupation cluster;

E. Organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;
Integrated Education & Training

The Institute for Education Science (IES) What Works Clearinghouse (WWC) confirms IET as an evidence-based practice.

Gold standard research identified three random control trial studies that meet the WWC criteria, documenting impacts on 45,413 students in nine states and demonstrating

- +18 positive effects on industry-recognized credential, certificate, or license completion
- +10 potentially positive effects on short-term employment.

An Eligible Career Pathway:

F. Enables an individual to attain a secondary school diploma or its recognized equivalent, and at least 1 recognized postsecondary credential; and

G. Helps an individual enter or advance within a specific occupation or occupational cluster.
Program Eligibility

Institutions make their own determination whether a career pathway program is ATB-eligible and must document the basis for this determination.

- Some colleges have used this optional checklist from OCTAE to help document their programs’ eligibility: https://lincs.ed.gov/publications/topic/wioa/careerpathways-checklist.pdf
Resources

- Federal Student Aid Handbook – Select the current Award Year, then Volume I (Student Eligibility) https://ifap.ed.gov/ilibrary/document-types/federal-student-aid-handbook
- COABE ATB Symposium videos coabe.org/ability-to-benefit
THANK YOU!

Judy_mortrude@worlded.org
Implementation Exemplars

Wisconsin Technical College System, Scott DuBenske
Washington State Board for Community and Technical Colleges, Nicole Hopkins
Pima Community College, Laurie Kierstead-Joseph
Moderator: Rachel Hirsch, NGA
WTCS Ability to Benefit Action Lab
Wisconsin Technical College System

- Career Pathways
- Title II of WIOA
- Integrated Education and Training
- WTCS Commitment to Progress
- Wisconsin 60 Forward Credential Attainment Goal
ATB State Define Process: Year in Review

• Communicating ATB
• Forming an ATB Community of Practice
• Mechanisms to monitor ATB implementation
ATB Evolution and Progress

1991
Non-high school graduates allowed to receive financial aid if they pass an exam

1992
New option for student eligibility: through a state-defined process

1995
ED publishes regulation on state-defined process

2008
New option for student eligibility: completing 6 credits/equivalent

2012
ATB eliminated by Congress to reduce costs

2015
ATB restored with career pathway program requirement

2016
Career pathway definition aligned with WIOA

2019
WTCS hosts regional convenings in anticipation of state process

2019
WTCS state defined process is approved!

2020
ATB Community of Practice

In the context of the ATB state option, community of practice goals include:

• Sharing techniques and strategies with one another
• Supporting one another
• Fostering System collaboration
• Improving outcomes for ATB students
• WTCS colleges driving future meeting topics
Mechanism to Monitor ATB Implementation

• ATB Memorandum of Understanding
• ATB Leadership Grant
• Refining the WTCS data infrastructure
WTCS ATB Resources

- WTCS Adult Education Page
- WTCS Ability to Benefit User Guide
- WTCS Ability to Benefit State Process
- WTCS Ability to Benefit Student Testimonies
Ability to Benefit – State Context

• We know that approx. 600,000 adult Washingtonians need both a high school and postsecondary credential in order to move into a living wage career.

• Studying for a high school credential first slows these students down on their path to a living wage career – costing both them and our state time and money.

• Guided Pathways is a state wide initiative that creates clear educational pathways for our students to obtain degrees/certificates and get out into the workforce faster, Ability to Benefit keeps students on the pathway by providing access to Federal Financial Aid while students are working on completing their GED or High school diploma.
Ability to Benefit – Federal Options

• Until this year, students could demonstrate eligibility for state and federal ATB through one of two means:
  • Testing at a certain level
  • Earning six college credits first.

• These requirements create access but still include barriers.

• The law allows states to propose an alternate method – a third, “state-defined process” for demonstrating eligibility.
Ability to Benefit – WA State Process

• Washington state's process allows students co-enrolled in I-BEST and our competency-based High School Plus (HS+) program to meet the core ATB student eligibility requirement and bypass the testing/credit options.

• We mirrored these same three eligibility requirements in our state Washington College Grant – aligning state and federal aid programs for our students.
# State and Federal ATB: The Chart

<table>
<thead>
<tr>
<th></th>
<th>Washington College Grant ATB</th>
<th>Federal Pell Grant ATB</th>
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</thead>
<tbody>
<tr>
<td><strong>Application</strong></td>
<td>FAFSA or WASFA</td>
<td>FAFSA</td>
</tr>
<tr>
<td><strong>One of the three options:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Achieve a cut score on an approved test</td>
<td>YES</td>
<td>YES</td>
</tr>
<tr>
<td>Earn six college credits</td>
<td>YES</td>
<td>YES</td>
</tr>
<tr>
<td>Co-enroll in I-BEST and High School+</td>
<td>YES</td>
<td>YES</td>
</tr>
</tbody>
</table>
Ability to Benefit: A win-win

• This new option saves time and money for people looking to more quickly gain the skills and credentials needed for living wage careers.

• It also boosts our economic recovery by increasing the number of students who can get directly on a pathway to one of our programs of completion.
Ability to Benefit: Statewide Marketing

• To get this message out we are including this option in a statewide marketing toolkit that colleges can use to promote the option.
Questions & Contact Info

- **Contact Information:**

  Nicole Hopkins  
  Policy Associate, I-BEST  
  Washington State Board for Community and Technical Colleges  
  nhopkins@sbctc.edu | 360.704.4368

  William S. Durden  
  Director, Basic Education for Adults  
  Washington State Board for Community and Technical Colleges  
  wdurden@sbctc.edu | 360.704.4326
Ability to Benefit at Pima Community College

Laurie Kierstead-Joseph
Assistant Vice Chancellor
Adult Basic Education for College & Career
Pima Community College
lkierstead@pima.edu
Career Pathways at PCC: IBEST

- Level 1 Certificate
- Cohort model, one year
- Adult Education + CTE Instructor
- Embedded wraparound supports
- 50/50: Adult Ed / Developmental Ed
- Co-enrollment with Title 1
Braided Funding

- Basic Skills and Workforce Prep: WIOA Title II & Local College Funds
- Career & Technical Instruction: Local College Funds
- Tuition and Fees: WIOA Title I & Federal Financial Aid
- Wraparound Supports: WIOA Title I / II & Local College Funds
Our ATB Experience

• Adult Ed brought ATB to Financial Aid team
• Utilizing ATB for HSE-seekers in IBEST programs
• Students rarely have 6 credits, so must pass Accuplacer tests
• If student qualifies for CTE program, but not ATB, use WIOA Title I to fund first 6 credits
ATB: Year At-a-Glance

**IBEST Semester 1: Spring**
- Students reach qualifying Accuplacer scores use ATB
- Others use WIOA Title 1 funds for first semester

**IBEST Semester 2: Summer**
- All students who completed the first semester will have 6 credits and will now qualify for ATB

**IBEST Semester 3: Fall**
- Remaining students who have completed 6 credits and now qualify for ATB

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PimaCommunityCollege

Keep striving.
Why ATB may be Underutilized

• Some students qualify for CTE program, but not ATB; source of funding for the first 6 credits

• Misconceptions about HSE-seeking adult learners keep some colleges from proceeding with ATB

• Financial Aid offices are sometimes reluctant at the start due to the high level of responsibility they have

• Not all Adult Ed programs are housed within community colleges; partnerships need to be forged
75% Average IBEST completion rate
80% IBEST grads gained employment post-IBEST program
How to Get Started

• Start with programming:
  • Are you running a Career Pathways program?
  • Is it Financial Aid eligible?

• Build understanding and buy-in:
  • College leadership
  • Adult Ed and CTE partners
  • Assessment personnel
  • Financial Aid office

• Identify funding for first 6 credits; co-enroll with WIOA Title I
• Ensure college is offering ATB eligibility assessments
• Develop system to fund ATB students within college’s FA processes
Breakout Discussion: Decision Points and Priorities

Amanda Winters, NGA
Select a breakout group to join

Group 1 – Creating Eligible Programs
How do you define and determine eligible career pathway programs? How do you incorporate within IETs? Dev ed?

Group 2 – Engaging Institutional Stakeholders
How do you inform and engage financial aid, registrar, students?

Group 3 – Enhancing State-level planning
How can you encourage take up of ATB among institutions from the state level?

Group 4 – Forging Partnerships
How to best collaborate with ABE and other key partners?
Summary and Next Steps

Jack Warner, ESG
Amanda Winters, NGA