Ability to Benefit

Dual Enrollment for Adult Learners

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Today’s Discussion

• What is Ability to Benefit (ATB) and why does it matter?

• How to use ATB in coordination with career pathways?

• Adult education program examples that fit ATB criteria

• What stops use of ATB?

• Discussion on current work, possibilities, challenges
Ability to Benefit Timeline

- **1991**: Non-high school graduates allowed to receive financial aid if they pass an exam.
- **1995**: ED regulations about a state-defined process published.
- **2012**: ATB eliminated.
- **2016**: ATB career pathway definition updated to align with WIOA.
- **1992**: New option for student eligibility: through a state-defined process.
- **2008**: New option for student eligibility: completing 6 credits/equivalent.
- **2015**: ATB with a career pathway requirement created.
Federal Financial Aid Requirements

To be eligible for federal student financial aid a student must submit a FAFSA and meet all the following:

• 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
• **Show that they are qualified to obtain a college or career school education by:**
  • Having a high school diploma or a recognized equivalent
  • Completing a homeschool program
  • *Enrolling in a career pathway program and completing one of the “Ability to Benefit” alternatives*
What are the ATB Alternatives?

Individuals lacking high school diploma or equivalency (HSD/E) can access federal student aid when they have
• Passed an exam approved by the Department of Education
• or completed 6 credits (or 225 clock hours) toward a credential
• or followed a state defined process
• and are enrolled in an “eligible career pathway program”
Passing an Approved ATB Test

“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.”

• Students must score above a set “cut score” on one of the following tests:
  • Test: Wonderlic Basic Skills Test (WBST)
  • Test: Spanish Wonderlic Basic Skills Test (Spanish WBST)
  • Test: Combined English Language Skills Assessment (CELSA)
  • Test: ACCUPLACER (Reading Comprehension, Sentence Skills and Arithmetic)

• Tests last updated in GEN DCL 15-09 released June, 2015. Refer to that announcement for further information.
  https://ifap.ed.gov/dpcletters/GEN1509.html
## Approved ATB Tests

<table>
<thead>
<tr>
<th>ATB Tests Still Approved</th>
<th>Publishers &amp; Passing Scores</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wonderlic Basic Skills Test (WBST) Verbal Forms VS-1 and VS-2, Quantitative Forms QS-1 and QS-2. This is a paper and pencil test.</td>
<td>Wonderlic, Inc., 400 Lakeview Parkway, Suite 200, Vernon Hills, IL 60061</td>
</tr>
<tr>
<td></td>
<td>Contact: Chris Young, 847-247-2544</td>
</tr>
<tr>
<td></td>
<td>Passing Scores: Verbal 200, Quantitative 210</td>
</tr>
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<td>Wonderlic Basic Skills Test (WBST) Verbal Forms VS-1 and VS-2, Quantitative Forms QS-1 and QS-2. This is an online version of the tests.</td>
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</tr>
<tr>
<td></td>
<td>Passing Scores: Verbal 200, Quantitative 200</td>
</tr>
<tr>
<td>Combined English Language Skills Assessment (CELSA), Forms 1 and 2.</td>
<td>Association of Classroom Teacher Testers (ACTT), 1187 Coast Village Road, Suite 1,</td>
</tr>
<tr>
<td></td>
<td>#378, Montecito, CA 93108</td>
</tr>
<tr>
<td></td>
<td>Contact: Pablo Beuckelew, 805-965-5704</td>
</tr>
<tr>
<td></td>
<td>Passing Scores: CELSA Form 1: 97; Form 2: 97.</td>
</tr>
<tr>
<td>ACCUPLACER (Reading Comprehension, Sentence Skills, and Arithmetic)</td>
<td>The College Board, 250 Vesey Street, New York, NY 10281</td>
</tr>
<tr>
<td></td>
<td>Contact: The ACCUPLACER Program, 800-607-5223</td>
</tr>
<tr>
<td></td>
<td>Passing Scores: Reading Comprehension 55; Sentence Skills 60; and Arithmetic 34.</td>
</tr>
</tbody>
</table>
Completing Six College Credits

“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).”
State Defined Process

“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 the 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.”
Ability to Benefit (ATB)

What can students receive?

• Federal student aid to pay for postsecondary coursework and cost of attendance (living expenses, books, etc) without a requirement to first obtain a high school diploma or the equivalent (GED, HSED)

What is not covered?

• Remedial or developmental coursework
Federal Student Aid Resources on ATB

• **Dear Colleague Letter GEN-16-09** and Eligible Career Pathway Programs-Questions and Answers attached, published May 9, 2016
  • [https://ifap.ed.gov/dpcletters GEN1609.html](https://ifap.ed.gov/dpcletters/GEN1609.html)

• **Electronic Announcement** – Lists the approved Ability-to-Benefit tests, published June 24, 2015

• **Federal Student Aid Handbook** – Select the current Award Year, then Volume I (Student Eligibility)which contains ATB information and other important student eligibility concerns that would be helpful for anyone working with ATB students to know
  • [https://ifap.ed.gov/ifap/byAwardYear.jsp?type=fsahandbook](https://ifap.ed.gov/ifap/byAwardYear.jsp?type=fsahandbook)
Time Saving Benefit of ATB

Financial aid can help adult students save time

• With aid, students can work less and likely be more successful in their education

• For example:
  • If a student receives a Pell Grant of $1,480 per semester (half-time enrollment)
    = 134 hours at $11.00 per hour
    = 8 hr per week over a 16 week semester
Funding those Six College Credits

- Washington State Opportunity Grants (state financial aid)
- WIOA title I funds
- WIOA title II funds – Texas
- Foundation funds – MIBEST Kellogg Foundation
- California Adult Promise
How do I qualify?

1. Hit a cut score on a test  
or
2. Earn 6 college credits  
or
3. Use your state’s ‘defined process’
Eligible Career Pathway (Perkins V, HEA & WIOA)

... 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;
Eligible Career Pathway (Perkins V, HEA & WIOA)

C. 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;

D. 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;
Eligible Career Pathway (Perkins V, HEA & WIOA)

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.
Integrated Education & Training

“...a service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement.”

WIOA Sec 203(11)
Defining IET

Integrated Education & Training

“...a service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement.”

(34 CFR §463.35).

Adult Education & Literacy

“...programs, activities, and services that include: (a) adult education, (b) literacy, (c) workplace adult education and literacy activities, (d) family literacy activities, (e) English language acquisition activities, (f) integrated English literacy and civics education, (g) workforce preparation activities, or (h) integrated education and training” (34 CFR §463.30).

Workforce Preparation

“Activities, programs, or services designed to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in: (a) utilizing resources; (b) using information; (c) working with others; (d) understanding systems; (e) skills necessary for successful transition into and completion of postsecondary education or training, or employment; and (f) other employability skills...”

(34 CFR §463.34).

Workforce Training

“may include:
(i) occupational skill training...;
(ii) on-the-job training;
(iii) incumbent worker training...;
(iv) programs that combine workplace training with related instruction...;
(v) training programs operated by the private sector;
(vi) skill upgrading and retraining; (vii) entrepreneurial training;
(viii) transitional jobs...;
(ix) job readiness training provided in combination with services...(i) through (viii);
(x) adult education and literacy activities, including activities of English language acquisition and integrated education and training programs, provided concurrently or in combination with services described in any of clauses (i) through (vii); and
(xi) customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training.”

(WIOA Section 134(c) (3) (D), P.L. 113-128)
Program for ATB Must Have...

The seven elements of a career pathway just discussed

• Two of the seven elements focus on adult education & Title IV-eligible postsecondary working together
  • Adult education is defined the same as WIOA
  • Must be designed so students can participate in both components. But student is NOT required to be concurrently enrolled in adult education and postsecondary.
Institution must document...

• The student completed an ATB alternative and is enrolled in both adult education and postsecondary concurrently
• How the program meets the seven elements of a career pathway
• One way to do so is using this checklist: https://lincs.ed.gov/publications/topic/wioa/careerpathways-checklist.pdf
Approving a Career Pathway Program

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

• Nothing in the law says ED has to “approve or endorse” career pathway programs in order for them to offer ATB.
Ceasing to be an ATB Student

“A student who gained Title IV eligibility under one of the ATB alternatives ceases to be an ATB student when they obtain a high school diploma or its recognized equivalent. At that point, the student is no longer subject to the restrictions on ATB students, including that the student be enrolled in an eligible career pathway program in order to be (potentially) Title IV-eligible.”

Working with the Financial Aid Office

• Some financial aid officers appear concerned about awarding Pell without an endorsement from ED or another federal entity.

• In addition, ATB might require working across-the-institution in ways not done previously, and/or connecting with a population not previously served.

• Solution: strengthening collaboration between adult education, workforce, and financial aid
California Ability to Benefit Model to allow Individuals who are not high school graduates to use federal financial aid for Postsecondary CTE Career Pathway Programs

**ABE, ASE, ESL**
(Basic education at Adult School or Community College; funded by AEBG, WIOA title II, apportionment, or other. These costs not eligible for ATB/Pell Grant)

**CTE - Postsecondary**
[HEA title IV eligible program at Adult School or Community College]

**Career Pathway Program:** A combination of rigorous and high-quality education, training, and other services that –
There are multiple pathways to the Mississippi High School Equivalency Diploma

**Non-Sequential Education**

- **GED Testing Service**
  - General Education Development
    - Computer-Based
    - Subject Areas:
      - Reading & Writing
      - Science
      - Social Studies
      - Mathematics
    - Up to 2 discounted* retakes
    - $120.00 for full exam battery

- **ETS HiSET**
  - High School Equivalency Test
    - Computer or Paper-Based
    - Subject Areas:
      - Language Arts
      - Science
      - Social Studies
      - Mathematics
    - Up to 2 discounted* retakes
    - $85.00 for full exam battery

- **TASC**
  - Test Assessing Secondary Completion
    - Computer or Paper-Based
    - Subject Areas:
      - Language Arts
      - Reading & Writing
      - Science
      - Social Studies
      - Mathematics
    - Up to 2 discounted* retakes
    - $89.00 for full exam battery

**Mississippi Compromacy Based High School Equivalency**
- Enrollment Adult in Education
- EFL -- NRS Level 5/6
- Smart Start Credential
- National Career Readiness Certificate -- Silver
- M BEST/IET Pathway
  - 15 hours of college credit
  - Industry recognized credential
- Application Fee: $25.00

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State of Mississippi
Mississippi Community College Board
High School Equivalency Diploma
• EFL – NRS Level 5/6
• Enrollment in Adult Education
• Smart Start Credential
• National Career Readiness Certificate – silver
• MIBEST / IET Pathway
  • 15 hours of college credit
• Industry recognized credential
• Application Fee: $25
How to get to YES!

Common Concerns

• Want to use ATB with a new or existing career pathway program but don’t know where to start

• Wrongly believe career pathway programs must be ‘approved’ by some outside official in order to offer ATB

• Financial aid office throws up roadblocks (for a variety of reasons)

... and How to Address Them
“I don’t know what a career pathway is”

• **Review** the HEA **definition** of a Career Pathway and build understanding.

• Engage with the **workforce development division of your college**, who may already be implementing or considering career pathways.

• Perkins V & WIOA 2020 plans include **career pathways**.

• Your **local workforce development board** may also be working with other institutions in the area to develop career pathways and have insight on local needs.

• Consult the U.S. Department of Labor’s (DOL) **Career Pathway toolkit** which helps state partners develop career pathways.
“No one has approved this”

• ED has been clear that no federal agencies/officials are required to approve career pathways. *Institutions are empowered* to decide on their own whether certain career pathways are Title IV-eligible.

• Get buy-in and support from institutional higher-ups by engaging with your institution’s financial aid, workforce development, and adult education leaders, or find an institution- or state-level leader/champion to help you do so.
“I don’t know what I’m supposed to document”

• Review the information provided in the ATB Requirements section.
• Coordinate with others at your institution, including those who provide the workforce training or adult education components, to help you document what discussions and partnerships led to the creation of the career pathway.
“Is this worthwhile?”

- New jobs are going to people with at least some college
- Look at data on individuals in your community without high school credential
- New source of students!
- Find an institutional champion who understands the importance of giving people an opportunity to earn a postsecondary credential through ATB, as well as the opportunity it provides the institution.

CEW.GEORGETOWN.EDU/DIVIDEDRECOVERY
MIBEST Is Demonstrating Positive Impact

- **48%** of students have obtained a college-issued or industry-based occupational credential
- **21%** of MIBEST graduates have already attained higher-level certificates and Associate degrees

**Outcomes As of Spring 2019; N=1603**

- Seventy percent (70%) of MIBEST graduates are employed in their career fields or pursuing additional higher education leading to higher-paying jobs
- MIBEST completers nearly double their average earnings compared to what they earned before MIBEST.

Source: NSPARC Analysis of UI Wage records for MIBEST Completers and Exiters in 2016 through 3rd quarter of 2017; N=564
MIBEST Success

• In the first 21 months of program, MIBEST Completers nearly doubled their incomes after leaving the program.

• Even MIBEST “Progressors,” those who obtained one or more MIBEST Baseline Outcomes, which are our completion milestones, during this same time period, increased their incomes by fifty percent.

*National Strategic Planning and Analysis Research Center (NSPARC)*
### MIBEST “Caravan” to Economic Prosperity

<table>
<thead>
<tr>
<th>Category</th>
<th>Percentage</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Racial Composition</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Black</td>
<td></td>
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<tr>
<td>White</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other</td>
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</tr>
<tr>
<td>Gender</td>
<td>53%</td>
<td>Male</td>
</tr>
<tr>
<td>Marital Status</td>
<td>85%</td>
<td>Single</td>
</tr>
<tr>
<td>Ages of Participants</td>
<td></td>
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<tr>
<td>17-24</td>
<td></td>
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</tr>
<tr>
<td>25-44</td>
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<tr>
<td>First Generation College Students</td>
<td>41%</td>
<td></td>
</tr>
<tr>
<td>Entered MIBEST Without a High School Credential</td>
<td>91%</td>
<td></td>
</tr>
<tr>
<td>Students with Children Under 18 years of age</td>
<td>39%</td>
<td></td>
</tr>
<tr>
<td>Children Under 18 Affected by MIBEST</td>
<td>1097</td>
<td></td>
</tr>
</tbody>
</table>

N = 1447 Overall
“How do low-income students afford those first six college credits?”

• Many institutions that have implemented ATB find completing 6 credits is more attainable for students than passing an exam. Some use foundation grants or have redirected institutional funds; WIOA title I, II, IV funds; TANF funds

• Your state could also consider submitting an alternative process for consideration by the Secretary, which World Education can assist with.
Financial Aid Office Template – Georgia

**ATB CAREER PATHWAY PROGRAM (Financial Aid)**

<table>
<thead>
<tr>
<th>Student Name/ID</th>
<th>Name:</th>
<th>ID:</th>
</tr>
</thead>
</table>

Is student in an identified ATB eligible Career Pathway Program?  
Program:  

Is student in good standing in regard to Satisfactory Academic Progress?  

Has student completed the FAFSA application?  

Is the Student enrolled in credit coursework for the term? If so, how many credit hours?  
Program Credit Hours:  
Adult Ed Coursework:  
Verify the adult education coursework is not included in enrollment for Title IV purposes.

Has the designated member of the college signed off on the registration and enrollment in a designated Career Pathway?  

Does Banner correctly reflect this is an ATB student? (Student codes and FA codes are correct)  

Has the student been placed in the correct group so as the cost of attendance does not include the adult education components of the coursework?  
Group assigned to:  

**DRAFT**
## Career Pathway Template - Georgia

<table>
<thead>
<tr>
<th><strong>CAREER PATHWAY PROGRAM TEMPLATE</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>What Program of Study (Designated ATB Certificate/Diploma Career Pathway) is student working toward?</strong></td>
</tr>
<tr>
<td>Career Pathway: Program Title: Major Code:</td>
</tr>
<tr>
<td>Total Credit Hours:</td>
</tr>
<tr>
<td><strong>List any industry recognized license/s or certification/s students may be eligible to earn as a result of this ATB Career Pathway Program?</strong></td>
</tr>
<tr>
<td>Licenses:</td>
</tr>
<tr>
<td>Certifications:</td>
</tr>
<tr>
<td><strong>List the courses and credits that will be offered or may be taken at the college to fulfill the credits needed for the certificate/diploma program as well as the GED coursework.</strong></td>
</tr>
<tr>
<td>Courses:</td>
</tr>
<tr>
<td>Credit Hours:</td>
</tr>
<tr>
<td><strong>List the credentials students will earn as a result of completing the ATB Career Pathway.</strong></td>
</tr>
<tr>
<td>Certificate(s):</td>
</tr>
<tr>
<td>Diploma:</td>
</tr>
<tr>
<td><strong>College Contact Person of the ATB Career Pathway Program:</strong></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td><strong>When is the ATB Career Pathway Program offered by the College?</strong></td>
</tr>
<tr>
<td>Fall: Spring: Summer:</td>
</tr>
<tr>
<td>Part of Term: Part of Term: Part of Term:</td>
</tr>
<tr>
<td><strong>List the College staff and advisory members who participated in the selection of the industry sector.</strong></td>
</tr>
<tr>
<td>College Staff:</td>
</tr>
<tr>
<td>Advisory Members:</td>
</tr>
<tr>
<td><strong>What process did the staff use to determine the industry sectors? Describe how the industry partners were engaged in the Career Pathway selection and design process?</strong></td>
</tr>
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Referenced Resources

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- **CLASP ATB page**: [http://www.clasp.org/issues/postsecondary/pages/resources-on-ability-to-benefit](http://www.clasp.org/issues/postsecondary/pages/resources-on-ability-to-benefit)


Thanks – Keep in Touch!

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