

ABILITY TO BENEFIT

UNDERSTANDING IT & IMPLEMENTING IT AT YOUR INSTITUTION

Ability to Benefit (ATB) allows a student without a high school diploma or equivalency to receive Title IV student financial aid to pay for postsecondary education and training if they are enrolled in a career pathway program. To receive aid, the student must first complete 6 credits (or equivalent) applicable toward a degree or certificate, pass a Department of Education (ED) approved exam, or complete a state process approved by the Secretary of Education.

Definition of a Career Pathway

A career pathway is a defined service model that is delivered in partnership with education and workforce that helps individuals advance educationally and economically. The Higher Education Act (HEA) defines career pathway as: 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 and postsecondary education options, including apprenticeships registered under the Act of August 16, 1937;
- (C) Includes counseling to support an individual in achieving the individual's education and career goals;
- (D) Includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
- (E) Organizes education, training, & 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;
- (F) Enables an individual to attain a secondary school diploma or its recognized equivalent, and at least one recognized postsecondary credential; and
- (G) Helps an individual enter or advance within a specific occupation or occupational cluster.

How does this translate on the ground? What is important for institutions to understand and focus on?

- (A) *Alignment* is most significant: understand that local industry might need people with varying skill levels. Career pathway programs need to bring people in at all skill levels and offer opportunities to progressively build their skills.
- (B) The pathway can provide any of a range of *secondary* options – such as career and technical education, and/or high school equivalency work – and *postsecondary* – including higher education, apprenticeship, and industry-recognized credentials.
- (C) The pathway includes individual education *and* career planning.
- (D) and (E) are the *keys to the whole pathway*: they are about integrated education and training (IET). Students need to receive adult literacy, workforce preparation (like team work and self-management skills), *and* occupational training in the same context. Offering these components together is intended to streamline both the workforce preparation and education components so a student can complete the career pathway faster than if they completed each component separately. Examples of postsecondary IET programs can be found in the WIOA IET Models document on CLASP’s website.
- (F) The pathway gives students the ability to earn a secondary diploma or its equivalent *and* a postsecondary credential.
- (G) *Enter or advance* implies that individuals participating in the pathway can already be employed, and even be employed in that sector, but need not be.

ATB Requirements

To award aid using ATB, institutions must follow the same rules and procedures as for awarding Title IV aid in other contexts, with one additional requirement: documentation. ED guidance says institutions must document the following when awarding aid using ATB:

- How the career pathway meets each of the listed elements in the definition (A-G).
- How the career pathway includes workforce preparation activities and training for a specific occupation or occupational cluster *and* is aligned with local needs.
- That the student both: completed the exam/6 credits/state process to make them eligible for aid through ATB; and is enrolled in adult education *and* postsecondary (concurrent enrollment is not required).¹

ATB works best when there are strong partnerships between the institution and workforce development in your local area. When you, as an institution, work in collaboration with workforce development and adult education partners, decisions about the types of career pathways to offer and how they will be implemented will be made jointly. This ‘all in it together’ aspect makes justifying your decision to award aid through ATB that much easier in the event of a routine program audit. These partners can also be critically helpful in identifying and describing relevant items that must be documented.

¹ Note: Students who previously enrolled in a postsecondary program of study before July 1, 2012 are not required to enroll in a career pathway in order to be eligible for aid through ATB.

Common Concerns and Tools to Address Them

“I don’t know what a career pathway is”

- Review the information provided in the Definition of a Career Pathway section.
- Engage with the workforce development division of your college, who may already be implementing or considering career pathways (or similarly structured programs). 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. The toolkit describes the Workforce Innovation and Opportunity Act (WIOA) definition of career pathways, which is identical to the definition used by the HEA.

“I don’t know who approves” or “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.
 - Note: consultation with accreditors, relevant state officials, and/or other parties, may be necessary depending on your specific circumstances. For instance, Minnesota, Kentucky, and Washington, have issued clarifications or guidelines about ATB. Your state may have officially established a state-level approval process – or affirmatively stated there is no process.
- 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.
- Contact Lauren Walizer or Judy Mortrude at CLASP (contact information below) who can provide an example template that you could consider as a starting point for your documentation.

“This doesn’t seem like something worthwhile” or “What’s the justification for doing this?”

- More than 1 in 10 adults age 25 or older lack a high school diploma or equivalent.² With ATB now available, these individuals are an untapped pipeline of students that can help institutions increase their program or institutional enrollment during slow periods.
- 11.6 million jobs have been created since the Great Recession: 11.5 million of them went to workers with at least some college, whereas 80,000 have gone to individuals with a high school diploma or less.³ ATB is the only way to make college accessible and affordable for those without a diploma, so they are able to gain enough educational experience to find quality employment.
- AIR’s website for the PIAAC, an international study about the cognitive and workplace skills of adults, contains a number of infographics that show how the skills of people living in the U.S. fall short compared with those in other countries.
- Consult your institution’s adult education division or contact local adult educators in your area to better understand the educational need that exists for this population.
- Consider finding an institutional or state leader-champion who understands the importance of giving this population an opportunity to earn a postsecondary credential through ATB, as well as the opportunity it provides the institution.

“These individuals have low-incomes. Since they are initially unable to receive financial aid, how will they pay for the first 6 credits to become eligible through ATB?”

- 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; in Louisiana there has been policy change at the state-level.
- Your state could also consider submitting an alternative process for consideration by the Secretary, which CLASP can assist with.

² Camille Ryan and Kurt Bauman, *Educational Attainment in the United States: 2015*, United States Census Bureau, 2016, <https://www.census.gov/content/dam/Census/library/publications/2016/demo/p20-578.pdf>.

³ Anthony Carnevale, Tamara Jayasundera, and Artem Gulish, *America’s Divided Recovery*, Georgetown University Center on Education and Workforce, 2016, <http://cew.georgetown.edu/dividedrecovery>.

Still Have Questions? Resources You Can Consult

WIOA IET Model programs:

<http://www.clasp.org/resources-and-publications/publication-1/WIOA-IET-Model-Programs.pdf>

Find your local Workforce Development Board:

<https://www.servicelocator.org/workforcecontacts.asp>

U.S. DOL's Career Pathway Toolkit:

https://www.doleta.gov/usworkforce/pdf/career_pathways_toolkit.pdf

PIAAC Gateway:

<http://piaacgateway.com/infographics>

Find your local Adult Education provider:

http://www.naepdc.org/members/members_home.html

Louisiana's 5 for 6 Scholarship for ATB students:

<http://www.nwltc.edu/5-for-6-scholarship/>

Latest ED guidance on ATB, Dear Colleague Letter GEN-16-09:

<https://ifap.ed.gov/dpclatters/GEN1609.html>

CLASP's ATB page:

www.clasp.org/issues/postsecondary/pages/resources-on-ability-to-benefit

Contact

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