CENTER for POSTSECONDARY and ECONOMIC SUCCESS

Building Skills

Improving Connections to Student Aid

at CLASP

Helping Low-Income Students Benefit from National Investments in Workforce Training

NOVEMBER 2016 | LAUREN WALIZER

Introduction

The prior paper ("No Educational Experience Should Be an Island") in our "Building Skills, Remodeling the HEA" series highlighted the prevalence of noncredit workforce training programs, largely based at community colleges, funded through federal programs like the Trade Adjustment Assistance Community College Career Training (TAACCCT) Grants and Health Education Professional Opportunity Grants (HPOG).¹ While these programs of study provide relevant in-demand training, all too often they fail to offer resources to help students pay for all of the costs required for them to attend, particularly since many are designed as noncredit programs and thus are typically ineligible for student financial aid under Title IV of the federal Higher Education Act (HEA). Our earlier paper summarized findings from interviews with college administrators, state and federal program administrators, and workforce investment boards and highlighted several programmatic issues with setting up workforce training at community colleges. In this paper, we turn our attention to how these programs addressed their students' financial needs.

The increasing burden of paying for all types of postsecondary education has driven a broader conversation on college affordability, including widespread consideration of proposals for "tuition-free college" across major news outlets and the higher education trade press.^{2,3} One such proposal, President Obama's America's College Promise, is designed to support students through the completion of an associate's degree, with the intent that students will use that schooling as a stepping stone to a bachelor's degree. However, many students plan to earn one or more sub-associate credentials leading up to an associate's degree through workforce training; such short-term certificates are the fastest growing segment in postsecondary education. How can these programs be made affordable? And where do these students currently turn for help in paying for their postsecondary coursework?

Many workforce training programs explicitly target low-income and low-skilled individuals—or are implicitly appealing to these individuals—because of the job opportunities these programs provide through their connections with employers. Unfortunately, neither student financial aid nor any other sources students and institutions leverage commonly cover all costs. Besides overall levels of available aid being too low, in many cases the variety of funding sources makes coordination too difficult to manage.

As a result, students confronted with the intimidating challenge of paying for training are often led to an inelegant 'spaghetti solution.' That is, they locate multiple potential funding sources and throw them at the costs of college to see what sticks. Perhaps not surprisingly, students without a high school diploma or equivalency face the greatest

challenges in obtaining resources to pay for training offered by postsecondary education institutions. The spaghetti solution is frequently unsuccessful, as evidenced by the high rates of unmet financial need, particularly among low-income students.⁴ The consistent, decades-long history of federal investment in community college-based workforce training programs (summarized in the box on page 11) is likely to be continued in some form after the end of the TAACCCT and HPOG programs. Any such initiative must draw lessons from the recent past, in order to address the lack of dedicated funding for education and training, and the resulting unmet need. We recommend the following policy changes:

- Widely scale up the not-yet-operational federal America's Promise Grants, a U.S. Department of Labor (DOL) program offering funding for tuition-free college programs that include sector partnerships among community colleges, employers, and the workforce system.⁵
- Better coordinate federal public benefits policies with student requirements of attending postsecondary education, a particularly important strategy since low-income students already seek support from Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), and other public benefits programs.⁶
- Clarify that short-term credentials part of a career pathway are eligible for Title IV aid.⁷
- Restore the year-round availability of Pell Grants to mitigate the negative effects of aid disbursement timing.
- Support colleges' widespread promotion of the HEA's Ability to Benefit (ATB) provision of student aid to participants in a career pathway who lack a high-school diploma or equivalent. Institutions should be given greater certainty about the definition of an "eligible career pathway program" for this purpose (such as by offering a safe harbor for institutions that rely on designations of career pathways from their state workforce agency).

How do students finance their training?

Although the Title IV student financial aid programs offer significant funding to postsecondary students each year (an estimated \$127 billion in 2015-16, including Pell Grants, student loans, Federal Work-Study, and Supplemental Educational Opportunity Grants (SEOG)), these funding sources play a far smaller role in providing student assistance for workforce training programs than they do for traditional academic programs. Beyond personal savings or earnings, students rely on a wide array of more than 20 different federal, state, private, insitutional, and other funding sources to pay for such training programs.



* Not cited by interviewees, but well-documented options for meeting student postsecondary financial needs.

Students in both TAACCCT and HPOG programs commonly braided resources (that is, used multiple funding streams), and were assisted by institutions to do so. This strategy was necessary because one or two resources alone might not be enough to cover individuals' educational expenses for a variety of reasons. For example, students might not qualify for them all, don't know how to seek them out or access them when they are identified, or run out of eligibility before completing their program. Other reasons might include that the timing of the receipt of aid does not align with when students need the funds or that institutions don't offer resources from certain programs, or, restrict how some program resources can be spent by students. Several of these coordination issues will be discussed more in depth in the next section.

The most common strategy institutions employed was using Title IV aid as part of a larger portfolio that included workforce training funds provided through the Workforce Innovation and Opportunity Act (WIOA) or the TAACCCT or HPOG programs. For instance, at a Midwestern tribal college, students were required to seek aid outside of Title IV, and students commonly receive aid from institutional work-study and/or scholarships, as well as from some Native American tribes.

TAACCCT funding is allowed to assist institutions in the creation of new programs, including purchasing equipment or hiring staff, but cannot be provided to students as payments for tuition or other expenses.⁸ In some cases, students paid for programs of study created through TAACCCT by using employer subsidies. While some students may have received Title IV aid, the officials we interviewed generally did not know with certainty the extent to which this was true. Similarly, interviewees assumed that many students who used WIOA Individual Training Accounts (which are provided through state workforce boards and cover the tuition and fee expenses of programs provided by an eligible training provider) probably also used Pell Grants and/or student loans, but the prevalence of their use was not clear. In contrast with traditional academic higher education, those we interviewed from postsecondary institutions perceived less connection to Title IV aid for workforce training programs.

Some institutions participating in HPOG cited the "first-dollar" nature of the program, meaning that tuition and fee costs are covered first, with remaining funds applied to the other costs of attendance. An institution in the Southwest bases its programs on the clock-hour, which typically operate at a higher cost than traditional credit-hour based programs. (This higher cost is also reflected in the price students pay.) In the institution's nursing career pathway, HPOG funds apply to tuition and fees, with Title IV aid and WIOA funds layering

ROADBLOCK FOR LOW-INCOME STUDENTS

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Students' options for financing their training are limited both by insufficient amounts from any one source and too many rules that make their use inflexible. Thus, students must braid many sources together in the hopes that, in combination, they will have enough funding to complete their program.

SOLUTIONS

- Allow grant funds to pay for tuition and fees as part of any workforce training initiatives, including future federal investments.
- 2. Institutions must consider providing additional assistance for costs beyond tuition to meet the needs of their student population, such as providing student supports, scholarships for required items, and emergency aid.

on top. This combination is typical for the institution's students, particularly those in a pathway with classes for academic credit. (Notably, in this example, the program awards academic credit, a critical point we addressed in our prior paper about the challenges students face in noncredit programs.⁹)

While HPOG funds could pay for students' tuition and fees, some institutions were acutely aware that other costs such as housing, child care, or food—can be major factors in limiting student persistence. These institutions developed aid packages that were also comprehensive of student support services and emergency assistance, which have shown to be effective at supporting students and keeping them engaged in college.¹⁰ One respondent from a college in the Midwest noted the importance of providing emergency aid for expenses like food or rent, which it does on a case-by-case basis. Moreover, administrators there learn about and assist with the greatest needs of their students: child care (by either providing funds to subsidize child care or suggesting a child care provider that can meet their needs), transportation (by offering gas cards), and internet services. In addition to providing emergency aid, an institution in the Southwest awards scholarships for essentials beyond tuition, for example equipment, lab fees, shoes, or scrubs. Since HPOG career pathways are built around health care careers, such ancillary expenses are very much costs of attendance that pose particular burdens for low-income students.

Like HPOG, America's Promise Grants (which is currently soliciting grantees) will use federal dollars to provide tuition-free workforce training, with a focus on in-demand careers and moving students through multiple steps of a career pathway. ¹¹ For students, this means being able to prioritize their Pell Grant, public benefits, personal, or other resources to pay for their books and living expenses, and hopefully, reduce the overall number of funding sources needed to make ends meet. The America's Promise Grants additionally prioritize, as part of their design, leveraging additional resources beyond those provided through the program at a level "sufficient to meet participants' needs."¹² Crucially, this new program sets a goal for funding that meets students' needs, something that the current system, as evidenced by the high rates of unmet need discussed earlier, is incapable of achieving. Better coordination of federal funds means more efficiency in its use, and fewer gaps in aid from which students must to attempt to recover.

Using program funds to pay for tuition and other costs of attendance would likely improve access and persistence for low-income students, as programs that provide support for a student's tuition and fees are more likely to serve low-income—and lowest-income—students, including those without a high school diploma or equivalency.¹³ Future federal initiatives supporting community colleges should be designed with a student-centric perspective that takes this evidence into account, building on previous programs like the Community-Based Job Training Grants, which also allowed grant funds to be used for tuition and fees.¹⁴

How community-college based workforce training programs do (or do not) coordinate with Title IV aid

Pell Grants are termed the foundational Title IV student aid program. But how can Pell and other student aid be thought of that way when, in general, only 36 percent of certificate-seeking students at community college receive any Title IV aid?¹⁵ This may result, in part, from the well-documented failure of 30 percent of undergraduates, and nearly 40 percent of community college students, to complete the Free Application for Federal Student Aid (FAFSA), a necessary first step to receiving any Title IV aid.¹⁶

But the lower-than-expected use of Title IV can also be connected to the failure of coordination among the rules of Title IV programs and institutional program offerings and practices. In our interviews, institution officials very often discussed Title IV as a footnote to other sources of aid, or did not know whether it was used at all by students in their programs. It was not uncommon for institutions to choose a program design—or for participants to enroll in a program—even though it was not eligible for Title IV student aid.

Several factors played into these decisions to rely on funds outside of Title IV to pay for students' costs of attendance, including the following common themes from respondents across the country:

THE PROGRAM RUNS OR STARTS AT TIMES OTHER THAN THE TRADITIONAL SEMESTER SCHEDULE

Many workforce training programs have been created to address an immediate or near-term need in the labor market. This led many institutions to create programs that were noncredit, because the time and administrative requirements for operation were much shorter. A corollary of a quick start-up is that once programs are ready to enroll and educate students, institutions do not wait until the traditional semester start date. Many TAACCCT and HPOG institutions did this, and as a result they had issues with accessing or disbursing Title IV financial aid.

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For instance, an institution in the South had difficulties accessing aid since its program was offered as part of a cohort model running mainly on the weekends and evenings and starting as needed, when it's more convenient for students to attend while maintaining their employment. While Pell Grants have flexibility to be awarded in these interim periods, much state aid and federal campus-based aid (Work-Study and SEOG) is distributed on a first-come, first-served basis, and thus unlikely to reach these students who enroll in training programs at times that might not coincide with the start of an academic period.

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Students enrolled in training programs have limited use of Title IV student financial aid because of the characteristics of these programs and the limited options for low-skilled individuals.

SOLUTIONS

- 4. Restore year-round Pell, so students who do use Title IV aid can continue their studies throughout the year.
- 5. Connect students to comprehensive student supports, including public benefits and tax credits.
- 6. Clarify that students enrolled in any credential program in an eligible career pathway can receive Title IV aid.
- 7. Combine tuition-subsidized workforce training initiatives with use of the Ability to Benefit provision to give low-skilled individuals access to needed training.

However, Pell Grants are also limited by their inability to be awarded to students enrolled in coursework over the full calendar year. One institution from the Midwest said that the elimination of year-round Pell Grants hurt its nursing programs the most. This is perhaps not surprising given the large number of clinicals and outside-theclassroom work required in those programs, sometimes in semesters following the completion of in-class learning. It is crucial for federal policymakers to restore year-round Pell, which was discontinued in 2011. In addition, a broader rethinking of the flexibility and timing of providing resources is necessary. As a result of student aid rules, nontraditional students, particularly those who are older and often attend college while employed or on a lesstraditional schedule, are restricted from accessing many types of aid otherwise available to cover students' costs of attendance. Many of the institutions we interviewed offered some form of emergency aid to address this gap.

A key remedy should be simplifying student connections to comprehensive supports, including public benefits and tax credits, which students are able to use to cover expenses when financial aid isn't available or during periods between disbursements. Currently, nearly onequarter of community college students are the recipients of Medicaid (or other government-sponsored health insurance), and 15 percent of HPOG participants were

receiving TANF benefits at intake.^{17,18} College students are already leveraging public benefits programs—and many more are eligible but not connected to the system—so these benefits should be routinely included as part of a braided funding strategy for postsecondary education. One solution is to make connecting students to public benefits and refundable tax credits a "recommended activity" for TRIO Student Support Services and to make such outreach an authorized activity under Titles III and V of the HEA. (For additional recommendations, see CLASP's paper on "Bolstering Non-Traditional Student Success."¹⁹)

THE PROGRAM'S LENGTH IS SHORTER THAN WHAT'S REQUIRED FOR ELIGIBILITY

As we discussed in the first paper, federal regulations lack clarity about whether credentials awarded individually as part of a larger career pathway are eligible for Title IV aid. Without clarification, institutions typically take one of two interpretations of the existing rules: either they consider the initial steps of the career pathway to be embedded

credentials, subordinate to the terminal credential of the pathway, and thus part of the same program of study that collectively meets the minimum time requirements; or they read the U.S. Department of Education (ED) guidance narrowly to treat any credential component on its own as not meeting the length (and other) requirements and thus ineligible for federal student aid.

We found this lack of clarity to be a common complaint among institutions, including one community college official who expressed frustration that her school took the latter view of the rules, thus deeming its for-credit phlebotomy program to be ineligible for Title IV aid. Requiring each part of the pathway to meet program-length standards severely limits the ability of institutions to develop meaningful career pathways, and in particular, pathways that can be responsive to students' and employers' needs. Such an interpretation also limits students' ability to pay for valuable training, as even initial credentials in a career pathway that can lead to earnings increases require an initial expense that can be substantial for a low-income individual. At an institution in the Midwest, the first credential in its HPOG program requires eight weeks of study (including two weeks of clinical training) meeting eight hours per day, three days a week. The total cost is \$1,250, which is on top of the opportunity costs to the student stemming from not being able to work a full-time job while attending school. An institution in the Southwest similarly said its nursing assistant program cost \$1,800 for 120 hours of training.

The Higher Education Act's ATB provision making federal student aid available to individuals participating in a career pathway without a high school diploma or equivalent has led an increasing number of postsecondary institutions to seek answers about the Title IV eligibility of short-term training "embedded" in longer programs of study. It is more relevant and imperative than ever for ED to clarify that every step along an eligible career pathway is eligible for financial aid or whether a change in the statute is necessary to do so.

THE PROGRAM'S STUDENTS DO NOT HAVE A HIGH SCHOOL DIPLOMA OR EQUIVALENCY

Some institutions that serve low-skilled individuals (those without a high school diploma or equivalent) also did not design their programs to make Title IV aid accessible. Instead, they used alternative systems and funding streams to account for the difference. For instance, an institution in the South received a grant from a foundation specifically to serve individuals without a high school equivalency (HSE) certificate. They planned to use at least some of that for funding "college navigators," people who offer support to those students with little postsecondary experience who might lack the skills or knowledge to efficiently operate within postsecondary systems.

Institutions might instead use an Integrated Education and Training (IET) model to offer coursework that helps students attain a HSE concurrently and in context with college-level skills training tailored to specific occupations.²⁰ An institution in the Southwest set up such a program for its behavioral health program. At least one IET program provided basic skills instruction for free; Title IV aid was available after the HEA-required completion of six credits for students without a HSE. Students typically would have to pay for those six credits out of pocket; however, at least one northern Midwest institution offers grant funds to cover the costs of instruction, books, and related costs for those initial credits.

Since 2014, the ATB provision in the HEA has been available to provide resources to low-income, low-skilled individuals without a HSE who are enrolled in an eligible career pathway. This provision allows such individuals to use Title IV aid to pay for college courses if they have passed an exam or completed six credits. Some institutions have shifted toward co-enrollment and/or career pathways models in order to make federal aid available to their students through the ATB provision. Using such structured pathways, where students can earn credentials with value in both the secondary and postsecondary spaces, is a smart design for institutions and limits potentially time-consuming self-navigation through the program and use of time-limited Pell Grants by students.

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The TAACCCT and HPOG grantees we interviewed largely indicated they have not yet designed programs for low-skilled individuals to be eligible for Title IV aid through the ATB provision. CLASP's ATB resource page provides concrete examples of ATB programs in operation that institutions can use as a guide.²¹ ED could improve the take-up of ATB by clarifying its most recent guidance to reassure postsecondary institutions that they can award Title IV aid by making a good faith reliance on designations by their state's workforce agency that a program meets the HEA and WIOA definition of an "eligible career pathway program."

One approach with great potential for workforce training would be to braid ATB funding with the implementation of America's Promise Grants. Students who qualify for ATB and participate in career pathway initiatives will still be unable to receive Title IV student aid until they complete six credits (or pass an exam). By combining tuition-free training from the America's Promise program—most critically, prior to the six-credit threshold—with Title IV eligibility once the student has earned six credits, institutions could break down a major affordability barrier for low-income students.

THE PROGRAM'S STUDENTS WOULDN'T QUALIFY FOR PELL GRANTS

Finally, institutional officials determined that many of their students would be ineligible for, or have great difficulty accessing, student aid. Workforce training programs are not just about providing individuals without postsecondary experience a credential that helps them get a job; they also re-engage individuals with prior education who are out of work and/or need to update their skills. These students may have previously used Pell Grants to get training, yet have little or no eligibility remaining.

For one Midwestern institution we interviewed, this was a concern. Many of its students had prior college experience and careers, and therefore had used up much (or all) of their Pell eligibility. Traditional-aged students had different challenges: these students were functionally independent, living separately from their parents and having little contact with them, but due to the rules on student dependency were required to continue applying for aid as a dependent student.

And an institution from the Pacific Northwest noted that Pell Grants are inadequate as an aid source in general, given that its students often run up against the annual limit, lifetime limit, and 150 percent of program length limit. Further, a number of its students couldn't access Title IV aid in the first place, because those students had a prior degree from another country. The result: none of their previously earned coursework could transfer and those students could not qualify for Pell Grants.

As a precaution, one institution from the Southwest encouraged its students not to use any of their Pell eligibility unless it was necessary, particularly if they had received Pell Grants in the past. This is a positive, proactive—and logical—step by the institution, but also demonstrates why Title IV aid was, on face value, underutilized by community college-based workforce training programs.

Another institution made the judgment that its students weren't able to complete the FAFSA (presumably because of low literacy levels and the time commitment required), which makes designing a student aid-eligible program moot. As a result, administrators there designed a program that fit the employers' and institution's needs, ignoring the program-length requirements and approvals that would have been necessary to participate in the federal student aid system. A different institution relied on philanthropic funding rather than tapping student financial aid.



Conclusion

More than ever, policymakers and practitioners in postsecondary education are aware that paying for college involves more than tuition and fees—and these "other costs of attendance" often place a great burden on low-income students. This is particularly true for those participating in workforce-focused education like short-term certificate programs. Policy choices have made financing postsecondary education of all types unnecessarily complicated; rarely one, or even two, sources of aid address both tuition and fees and other costs. In some cases, students are forced to find additional resources due to rules governing student or program eligibility that aren't acting in concert with today's students' postsecondary experience.

This system forces vulnerable students to navigate myriad public, private, and workforce financing options, complicating an already confusing interaction with postsecondary education, especially for first-generation students. The more hurdles students face in paying for education and training, the more likely it is that they will face negative consequences, either by missing the opportunity to receive available (and needed) student aid, or by borrowing more, working unsustainable hours outside of class, or dropping out. Many students continue to confront these challenges as they enter and participate in loan repayment after leaving school.

As federal policymakers consider options for future investments in providing workforce training through community colleges, they should provide funding for low-income students' tuition and fees, and improve coordination with other funding streams. In addition, reforms are urgently needed to improve existing federal investments so the disbursement of funds is better timed and matched to the needs of today's students. Such reforms should include connecting students to social supports, implementing year-round Pell, clarifying career pathway eligibility for aid, and increasing institutions' implementation of ATB. This two-part strategy of providing more aid for tuition and fees along with improving coordination of funding streams will promote better access to workforce training, and improve the chances for student success.

Why we wrote this series of papers

Building Skills

Well-designed workforce development or occupational training programs at postsecondary institutions allow individuals who earn credentials to connect their academic achievements directly with local employers in that field. Such training programs ideally provide a pipeline directly to employers, or teach skills that are in demand in the regional labor market. These programs are most often found at community colleges, which frequently serve as training centers for people to build workforce-relevant skills: in the most recent academic year, 86 percent of all certificates to graduates with no prior credentials were awarded at these institutions. Community colleges generally, and their workforce training programs in particular, are a critical part of the college completion agenda.²²

When employers are engaged as partners in designing such training, whether by informing the creation of new programs or modifying existing programs, low-income individuals have a better chance of gaining employment in the specific field for which they are trained. One of the best opportunities for these workers to advance economically is to gain the skills vital to family-supporting jobs that can be found in the local economy. Such job-driven training programs should also ensure low-income students can seamlessly connect their work and credentials to further their education and training in the postsecondary setting at a later date. Those responsible for creating these programs—at the local, state, and federal levels—must not only respond to employer demand but also help workers advance along a career pathway. Today's students are increasingly older and juggling work, family, and school, without financial support from their parents, and often are enrolled in training programs to build skills or change career paths.^{23,24} The challenges these students (in particular) have in navigating training programs are not just concerns around the periphery; as this series of papers underscores, they are at the heart of the issues both institutions and students struggle with while attempting to implement and participate in these programs.

For the past several decades, the federal government has offered a series of competitive grant-funded workforce training programs at postsecondary institutions: including the Job Training Partnership Act of 1982, the High-Growth Job Training Initiative that began in 2002, the multiple rounds of Community-Based Job Training Grants awarded to community colleges between 2005 and 2008, and more recent programs like Health Profession Opportunity Grants (HPOG) and Trade Adjustment Assistance Community College and Career Training (TAACCCT) grants. With the concluding round of TAACCCT grants now awarded, we anticipate that policymakers will seek in the future to continue this bipartisan trend of focusing dedicated funding on postsecondary education institutions (especially community colleges) as providers of job training. CLASP has identified best practices for the design of any successor program along these lines, which are applicable both to address real barriers to student success and to consider changes in the next reauthorization of the Higher Education Act that would better coordinate federal policy with occupational training programs at postsecondary institutions.

These training programs offer great promise: employers can recruit and build a skilled workforce, institutions can strengthen relationships and relevance to the labor market in their communities, and low-income students can learn skills that will get them a job. But have training programs been able to keep up with the changing demographic and attendance patterns of today's students? If not, what can we learn from how are they failing to do so and, particularly, how can they better support low-income people as they seek economic security?

These are the questions we set out to answer in the "Building Skills, Remodeling the HEA" series of papers, of which this is the second. CLASP conducted extensive conversations with two dozen federal officials, program evaluators, and grantees (which included institutions, consortia of institutions, workforce investment boards, tribal entities, and state-level government agencies) involved in four discretionary grant programs: TAACCCT, HPOG, Workforce Innovation Fund (WIF), and First In The World (FITW). This project was made possible through funding from the Bill and Melinda Gates Foundation.

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General summary of programs discussed in this series

Trade Adjustment Assistance Community College and Career Training (TAACCCT) Grant Program

TAACCCT is administered by the Employment and Training Administration (ETA) in the U.S. Department of Labor (DOL). Grants are provided to community colleges (and other institutions) to help them partner with local employers to offer education and training to participants for employment in high-wage, high-skill occupations. The program is designed to focus on displaced workers who are eligible under the Trade Act of 1974 for Trade Adjustment Assistance because their jobs were negatively affected by increased imports. TAACCCT was funded at \$500 million annually in 2011, 2012, 2013, and 2014. In the first three rounds of grants, more than 800 institutions were awarded funds either individually or as part of consortia.²⁵

Health Profession Opportunity Grant (HPOG)

HPOG is administered by the Office of the Administration for Children and Families in the U.S. Department of Health and Human Services. This program provides education and training to low-income individuals to prepare them for jobs in health care fields that are expected to be in high demand or experience labor shortages. Grants go to postsecondary institutions, community-based organizations, local workforce investment boards, state or local government agencies, and tribal organizations. The program has been appropriated \$85 million each year from 2010 through 2017. HPOG has 32 grantees, which, over the program's first four years, have enrolled more than 32,000 individuals.²⁶

First in the World (FITW)

FITW is administered by the Office of Postsecondary Education at ED. It is designed to support the development and dissemination of ideas that work to address common challenges in postsecondary education for many populations of students, such as adult learners, students of color, first-generation students, and working students. To support the development of best practices, FITW grants go to institutions, combinations of institutions, public and private non-profit institutions, and agencies. ED awarded \$74.6 million in development grants in 2014 to 24 grantees, and an additional \$60 million in development and validation grants to 18 grantees in 2015.²⁷

Workforce Innovation Fund (WIF)

WIF is also administered by the ETA office at DOL. Grants were provided to state workforce agencies, local workforce investment boards, and tribal entities to improve service delivery and evaluate the improvements. The intent was to better align programs in the fields of education, workforce development, human services, and economic development. In Round 1 (2012), DOL awarded \$146.9 million in grants; in Round 2 (2014), DOL awarded \$50.7 million; and in Round 3 (2015) the Department awarded \$35.6 million. In all, there have been nearly 50 grantee recipients.²⁸

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Endnotes

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