

CLASP

Policy solutions that work for low-income people

January 23, 2019

Assistant Secretary Scott Stump
Office of Career, Technical, and Adult Education
U.S. Department of Education

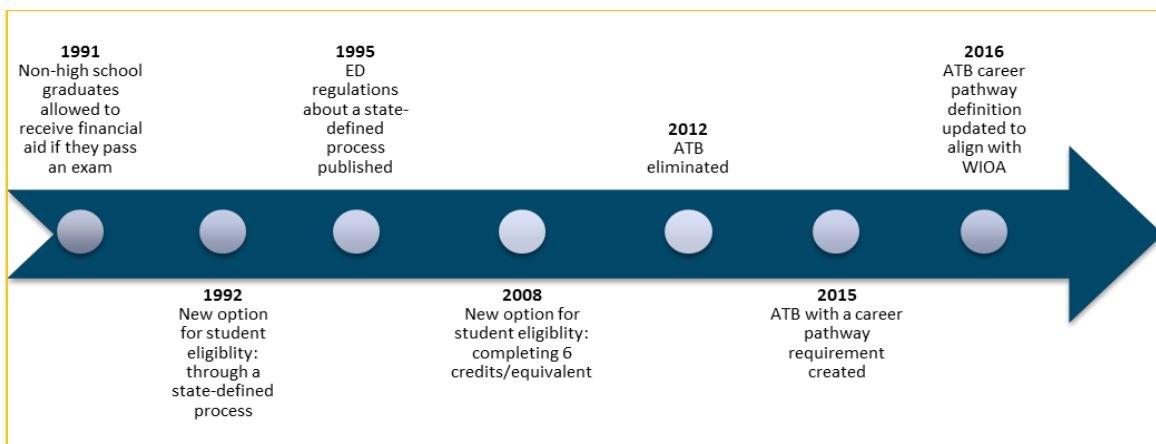
Dear Secretary Stump,

Thank you for this opportunity to meet and discuss the important topic of Ability to Benefit (ATB). CLASP has a unique focus on the accessibility and affordability of quality education and training for low-income adult students and opportunity youth, and we share the same sentiments as the U.S. Department of Education (ED): that ATB plays an important, yet currently underutilized, role in the success of these students. This memo draws on our experience working in this space, including presenting to adult educators, workforce development actors, and financial aid administrators; preparing materials to assist the field in understanding the provision; and providing technical assistance to states. In July 2018, we convened 14 states to discuss multiple policy and practice issues related to career pathways, which included a discussion on ATB.

ATB's significance lies in its capability to make educational success financially possible for students with diverse educational needs, while ensuring they get education and training that will both prepare them to be successful in a full range of secondary and postsecondary education options and fill an important workforce need. To fully seize the opportunities of ATB, CLASP recommends for ED to 1) expand the knowledge and understanding of ATB-eligible programs and 2) improve the criteria students must meet to be eligible for aid through ATB.

1. Expand the Knowledge and Understanding of ATB-Eligible Programs

While ATB was first introduced in 1991, subsequent Congressional interventions have sowed confusion among state and local financial aid officials and practitioners. We have heard this confusion from both state and local higher education administrators. The image below provides a brief history of ATB featuring several of those changes.



The confusion underscores the importance of basic information-sharing that would broadcast the benefits of ATB and build understanding of what types of programs are eligible. A recent legislative change with incredible potential to help these efforts is the inclusion of the 'career pathway' definition in the Perkins Act (P.L. 115-224). This is the first time 'career pathway' has been defined in the Perkins Act, and this definition is shared in both the Workforce Innovation and Opportunity Act (WIOA) and Higher Education Act (HEA). In 2020, states will be responsible both for drafting a new Perkins plan and for completing a new WIOA planning cycle. This is an ideal time for ED to begin framing ATB as a 'dual enrollment' strategy for adult learners.

Adjustments to the WIOA accountability system could also help incent the use of ATB. While 'transition to postsecondary' is used as a performance measure within the federal adult education system and in WIOA core partners as a whole, the Education Department's interpretation of 'transition to postsecondary' is only awarded at program exit. This interpretation would seem to directly conflict with the purpose of the metric within the WIOA Measurable Skill Gain performance measure which seeks to measure interim progress toward education and employment outcomes. Additionally, WIOA legislation defines and requires "Integrated Education and Training" models which support adult education and workforce preparation concurrently and contextually with career and technical education. This 'dual enrollment' strategy for adults is undermined by the guidance on 'transition to postsecondary' within the National Reporting System. ED should consider how its interpretation of 'transition to postsecondary' conflicts with the opportunity presented by ATB and address scenarios in which 'transition to postsecondary' would be a measurable skill gain allowable while an individual was still enrolled in WIOA titles I, II, and IV.

2. Improve the Criteria Students Must Meet to be Eligible for Aid through ATB

In order to be eligible for federal financial aid through ATB, students must be enrolled in a career pathway program, lack a high school diploma or its equivalent (HSD/E), and fulfill one of three criteria that demonstrates they have the 'ability to benefit' from receiving aid. From our work with states, we have heard that otherwise-eligible students face challenges with meeting the requirements of each option. While ED is limited in its ability to make changes, as each of these options are codified in the HEA, there are alignment opportunities to benefit students that are within the Department's purview.

Improve, Align, and Broaden Option 1: Passage of an Exam

The first option available to students is passing an exam, which must be among those on a list that ED maintains. As far as we are able to determine, that list was last published in 2015. There is nothing about its presentation on IFAP or elsewhere that makes it evident that it is the most up-to-date list available.

Further, the list lacks transparency for educational providers. Institutional providers have approached us with questions like what the cut scores are for ATB eligibility, if the cut scores differ from the other uses and cut scores for the exam, who determines the cut scores, and if the scores are standardized across institutions. Some of this information is printed in the FSA Handbook and other ED materials, but it is not accessible in one location or document. We also recommend ED consider a Q&A about this (and details of the other options, discussed below) to assist educational providers.

Finally, CLASP believes it would be worthwhile to align the tests on the ATB list with *Tests Determined to Be Suitable for Use in the National Reporting System for Adult Education*.¹ Aligning these lists would add to the ATB list, for instance, the Tests of Adult Basic Education (TABE) and other exams routinely used by WIOA title II adult education providers and WIOA title I youth providers. Given that these providers serve

the same populations that would benefit from ATB, coordinating these lists would add efficiency and coherence to the adult education system. This may require changes to the regulations that govern approval processes of ATB exams, if the standards for common list of measures exams do not correspond with ATB exam requirements.

We also recommend that ED consider a non-test exclusive option – multiple measures – to determine the ‘ability to benefit.’ This may be attained through the achievement of a lower test score but in combination with additional academic and/or professional achievement. An example of this might be using documented competencies in an adult high school completion model such as Washington States’ High School 21+ as a complement to test scores.²

Provide Cross-Agency Guidance on Resources for Option 2: Complete Six College Credits

The second option is that the student completes six college credits (or their equivalent). CLASP has frequently heard feedback from states and institutions that this poses a financial challenge for low-income students – the irony being that the student cannot receive federal financial aid without first completing six credits but cannot afford to complete six credits without that aid. While ED is not able to provide financial resources for these students, it could partner with the U.S. Department of Labor to issue guidance on utilizing WIOA title I adult, youth, and dislocated worker funds, or title IV vocational rehabilitative service funds, to address students’ needs. ED may also find opportunities to identify and lift up examples of best practices in states in instances where partners have successfully leveraged state, local, and/or philanthropic funds to pay for the six credits.

Provide a Template for Option 3: Complete a State-Defined Process

The third option is for students to complete a state-defined process. As you know, no state has ever submitted a state-defined process. Our July convening was attended by several states that are seriously considering this option. Many states are interested because they feel it is an opportunity to better integrate an innovation they have created or increase their use of career pathways. The absence of examples leaves a vacuum of information for states interested in submitting a plan. For instance, what state entity is authorized to submit a plan? Is it possible for states to revise a plan or negotiate its contents with ED after submission? It would greatly benefit interested states to have guidance on the submission process, including a template for application.

CLASP is thrilled that ED has taken on Ability to Benefit as a priority issue in 2019 and offers our support in whatever ways could be most useful to the agency and the field. We look forward to discussing these recommendations with you.

Endnotes

¹ Office of the Federal Register, “Tests Determined To Be Suitable for Use in the National Reporting System for Adult Education,” A Notice by the Education Department, September 21, 2018, <https://www.federalregister.gov/documents/2018/09/21/2018-20590/tests-determined-to-be-suitable-for-use-in-the-national-reporting-system-for-adult-education>.

² Washington State Board for Community and Technical Colleges, “High School 21+,” <https://www.sbctc.edu/colleges-staff/programs-services/high-school-21-plus/default.aspx>.