

# Ability to Benefit: Connecting WIOA & Student Financial Aid to Educate Low- Skilled Students

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# About CLASP

- Center for Law and Social Policy (CLASP)
- Anti-poverty nonprofit organization. We advocate for policy change to help individuals get out of poverty, find employment, and become self-sufficient.
- Focus on issues related to:
  - Out-of-school & disconnected youth
  - Child care
  - Job quality
  - Income & work supports
  - Postsecondary & economic success

# Today's Discussion

- What is ability to benefit and why does it matter?
- How it can be used in coordination with efforts to implement WIOA
- Examples in the adult ed space that are applicable to ATB
- Issues hampering development of career pathways that accept ATB
- Questions and chance to story share your own programs or experiences

# Why ATB is So Important



# Ability to Benefit (ATB)



- Benefit for Whom? (Who is Eligible)
  - Individuals lacking high school diploma or equivalency (HSD/E)
  - Who have passed an exam or completed 6 credits (or 225 credit hours) *toward a credential*
  - And are enrolled in an ‘eligible career pathway’
- What Benefit do They Receive?
  - Federal student aid (like Pell Grants) to pay for coursework
  - Allows individuals to enroll in postsecondary and gain employment without a requirement to first obtain a HSD/E

# Eligible Career Pathway

“Career pathway” means a combination of **rigorous** and **high quality education, training, and other services** that –

1. **Aligns with the skill needs of industries** in the economy of the state or regional economy involved;
2. Prepares an individual to be successful in any of a **full range of secondary or postsecondary education options**, including apprenticeship;
3. Includes **counseling** to support an individual in achieving the individual’s **education and career goals**;

## Eligible Career Pathway continued...

4. 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;
5. **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;



6. Enables an individual to attain a **secondary school diploma** or its recognized equivalent, and at least 1 **recognized postsecondary credential**; and
7. Helps an individual **enter or advance** within a specific occupation or occupational cluster.





# Integrated Education & Training (IET)

“...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 and 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 success 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) - (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

## 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" (*Final WIOA regulations at 34 CFR §463.35*).

#### Adult Education & Literacy

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(WIOA Section 134(c) (3) (D), P.L. 113-128)

# Adult Education Bridge Programs

## ServSafe® Food Safety Class

This class will prepare you for the ServSafe® exam and for the State Food Managers license.

## Special Low Pressure Boiler License Course

This course leads to a State special license which is the first step needed to operate or tend to low pressure stationary steam boilers and auxiliary steam equipment, such as pumps, compressors and air conditioning equipment.

## Commercial Drivers License Permit Class (CDL)

This class will teach you about certain education and training requirements for a Commercial Driver Permit and License.

## Retail/Customer Service Certificate

This class prepares you for customer service and sales in a variety of work settings; run a school store; improve communication and money skills; create a job skills portfolio.



# Workplace Learning Programs



A great college job that can turn into a career.

Jobs and internships await YOU!

**JOIN OUR FLOCK!**

**NOW HIRING**

Many fields!  
OVER **40** Degrees or Types of Education

Great pay & benefits!

Stable, growing employer!  
**32%** Team Members at Company for **10+ years**

A commitment to doing good!

The "Mother Hen" of two premium, natural chicken brands

**Goldb Plump**

Just **BARE** Chicken

dedicated to healthy food, families & farms

The banner features a blue sky with white clouds, green rolling hills, and a group of five diverse people (three women and two men) standing together. One woman is wearing a white lab coat and a blue hard hat, another is wearing a yellow shirt, and a man is wearing a grey shirt and a yellow hard hat. A speech bubble above them says "NOW HIRING". A red arrow points to the right with the text "JOIN OUR FLOCK!". The GNP Company logo is in the top left, and the Goldb Plump and BARE Chicken logos are in the bottom left.

Gnpcompany.com



# Pre-Apprenticeship Program



## Calling all interested in the construction field!

- Are you unemployed or underemployed?
- Looking for a new field to build a career in?
- Want to make a livable wage?



<http://jobconnectmn.com/wp-content/uploads/2016/01/Construction-Program-Flyer-2016.pdf>



Merrick Community Services is accepting applications for the Winter Session 2016

### Construction Training Program!

We have 25 enrollment spaces available.  
Classes start February 22, 2016.

The training program provides both construction training as well as Soft Skills:

- OSHA 30 Certificate
- Flagging Training Certificate
- First AID CPR & AED Certificate
- Fork Lift Training Certificate
- Scissor Lift Certificate
- Boom Lift Certificate

ECONOMIC SUCCESS



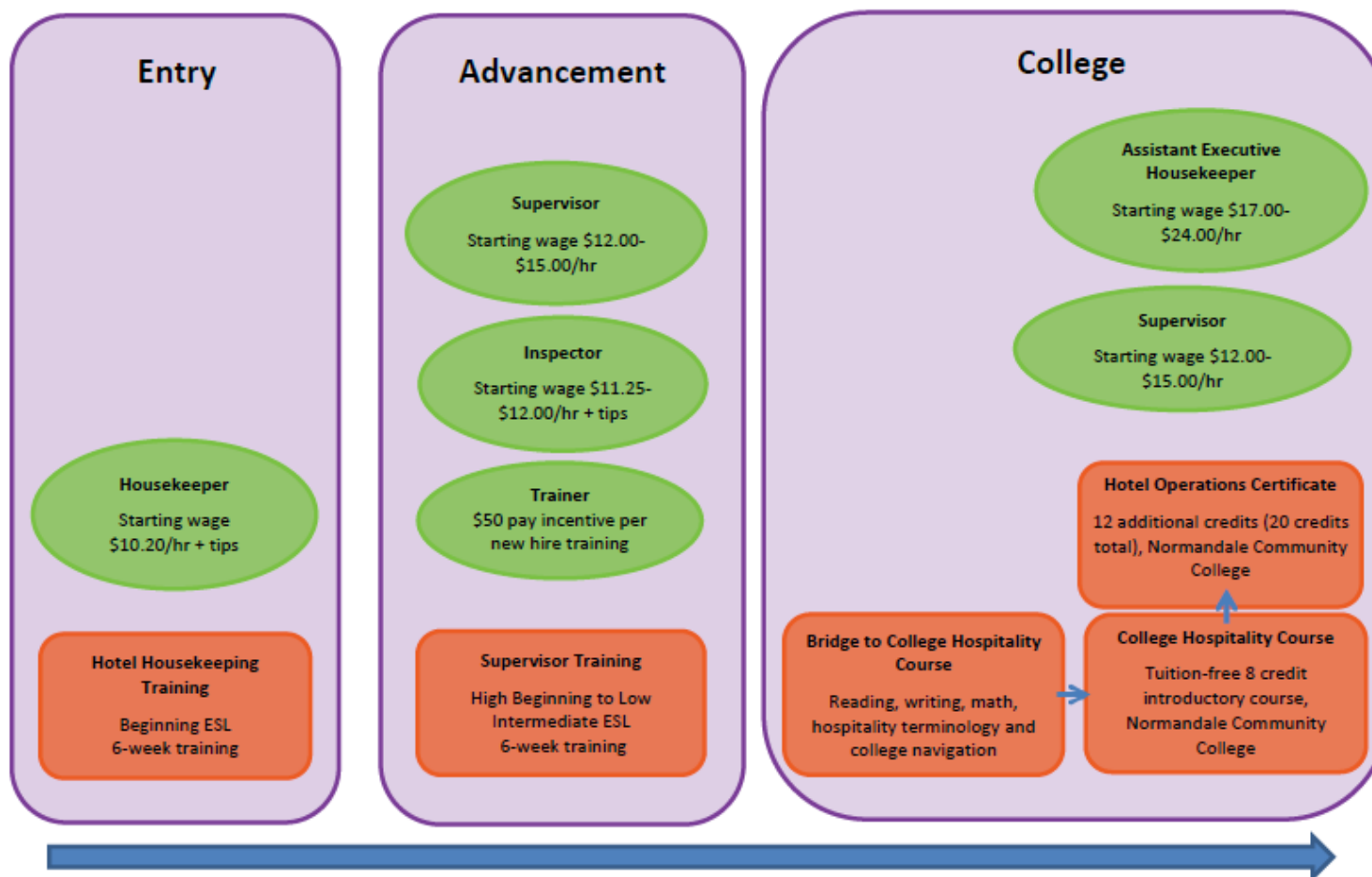
# Integrated EL Civics

“(a) education services provided to English language learners who are adults, including professionals with degrees or credentials in their native countries that enable such adults to achieve competence in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. (b) Integrated English literacy and civics education services must include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation and may include workforce training.” 34 CFR 463.33



INTERNATIONAL INSTITUTE  
*of Minnesota*

## Hospitality Careers Pathway



<http://www.iimn.org/classes/hotel-housekeeping-training-employment-program/>

# Educational Achievement Need Not Be Sequential: Postsecondary Achievement that Leads to a HSE

- Washington – High School 21+ program awards students a high school equivalency on the basis of competencies from high school and college transcripts, work/life/military experience, a prior learning portfolio, and/or testing.
- Wisconsin – High School Equivalency Diploma awarded based on postsecondary education achievement; retroactively awarded after the student completes 24 semester or 32 quarter credits in postsecondary.

# We've Got Issues:

## Common Inhibitors to ATB Implementation

- 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)



# At its Core, a Career Pathway Program for ATB Must Have...

- The 7 elements of a career pathway just discussed
- 2 of the 7 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.



## In Addition...

- Institution must document:
  - How it meets the 7 elements of a career pathway
  - The career pathway includes workforce preparation activities and training for a specific occupation or occupational cluster and is aligned with local skill needs.
  - The student completed an ATB alternative and is enrolled in both adult education and postsecondary



# 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.



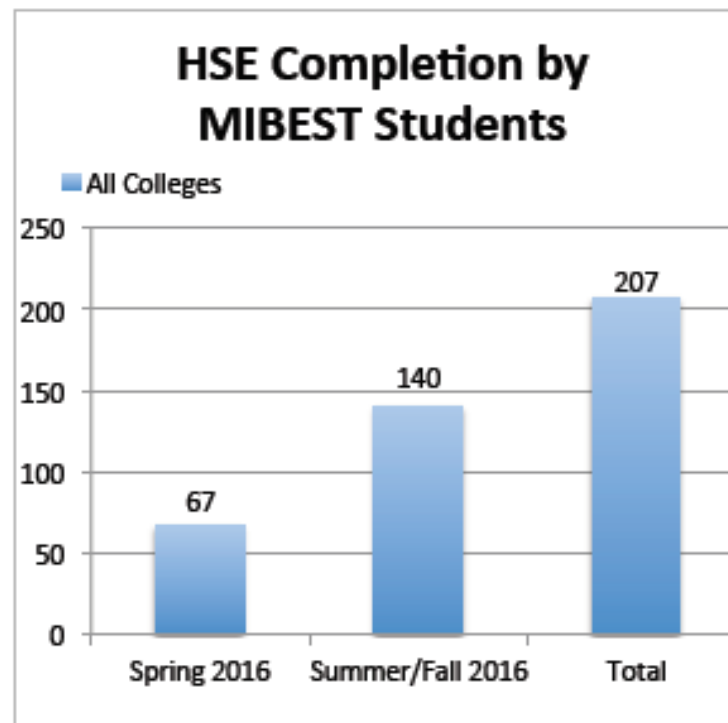
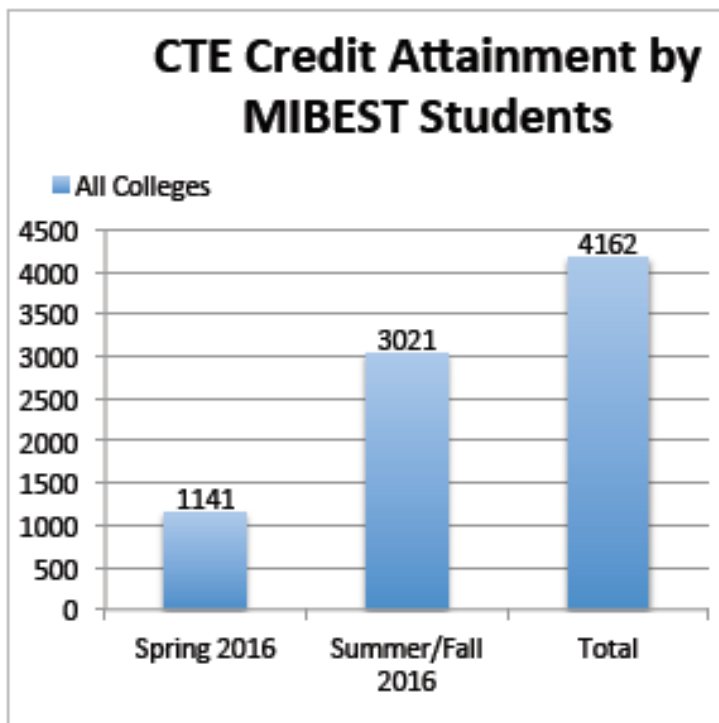
- Nothing in the law says ED has to “approve or endorse” career pathway programs in order for them to offer ATB.

# Hang-ups with the Financial Aid Office

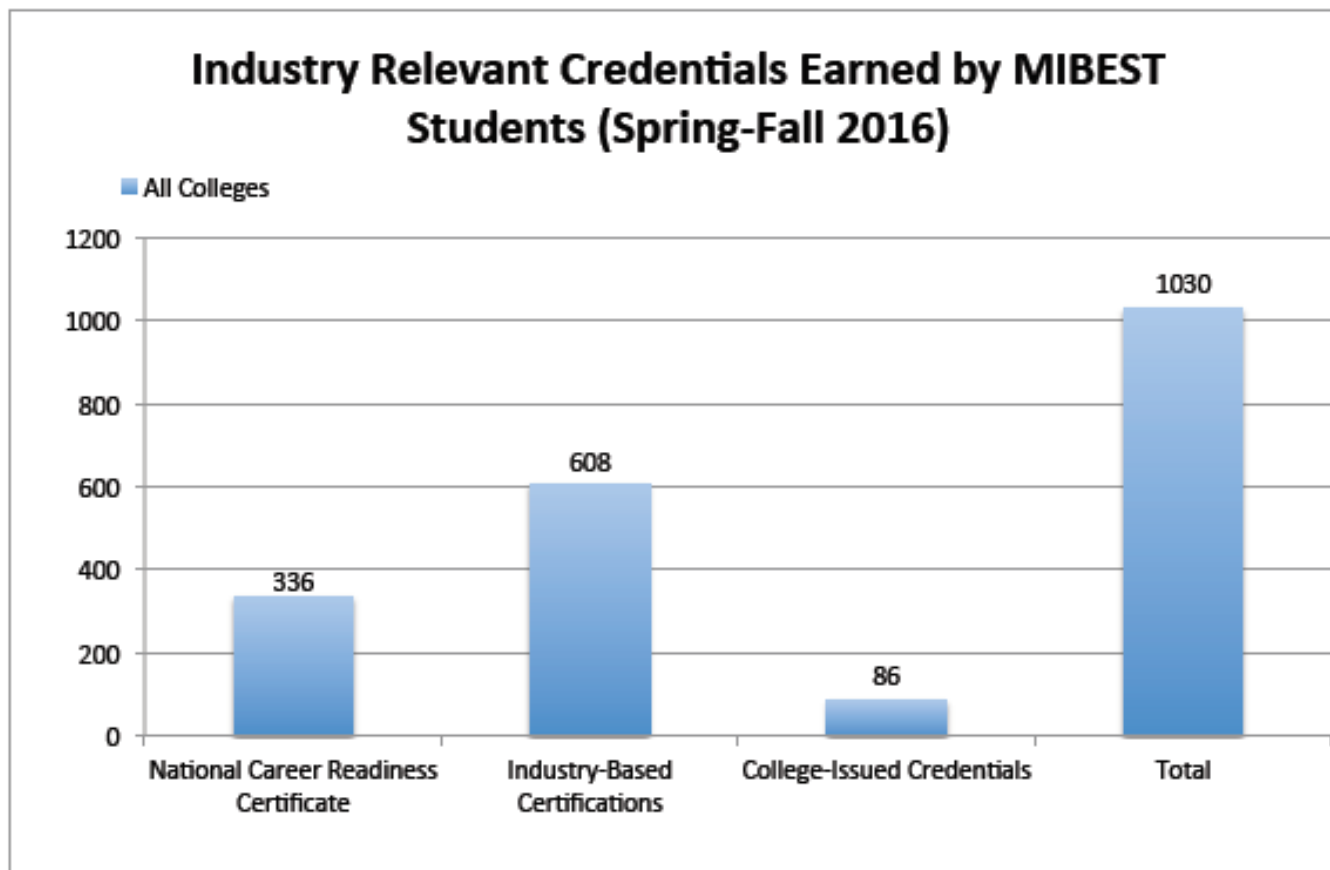
- Some financial aid officers appear concerned about awarding Pell without an endorsement from ED or another federal entity.
- In addition, ATB might require working across-the-institution in ways not done previously, and/or connecting with a population not previously served.
- Solution: strengthening collaboration between adult education, workforce, and financial aid



# MI-BEST: ATB Student Success



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# Example Financial Aid Office Template – Georgia

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

Student Name/ID	Name:	ID:
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?  Verify the adult education coursework is not included in enrollment for Title IV purposes.	Program Credit Hours:	Adult Ed Coursework:
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:	

# Example Career Pathway Template - Georgia

## CAREER PATHWAY PROGRAM TEMPLATE

What Program of Study (Designated ATB Certificate/Diploma Career Pathway) is student working toward?	Career Pathway:  Program Title:  Major Code:	Total Credit Hours:
List any industry recognized license/s or certification/s students may be eligible to earn as a result of this ATB Career Pathway Program?	Licenses:	Certifications:
List the courses and credits that will be offered or may be taken at the college to fulfil the credits needed for the certificate/diploma program as well as the GED coursework.	Courses:	Credit Hours:
List the credentials students will earn as a result of completing the ATB Career Pathway.	Certificate(s):	Diploma:
College Contact Person of the ATB Career Pathway Program:		
When is the ATB Career Pathway Program offered by the College?	Fall: Spring: Summer:	Part of Term: Part of Term: Part of Term:
List the College staff and advisory members who participated in the selection of the industry sector.	College Staff:	Advisory Members:
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?		

# A Review of How to Navigate Past “No”

- “I don’t know what a Career Pathway is”
- “I don’t know who approves” / “No one has approved this”
  - ED guidance says it’s not required; some states have issued their own guidance
  - Financial aid officer is empowered, they’re not innocent bystander
- “I don’t know what I’m supposed to document”
  - Guidance lists specific categories
  - Examples are available
- Disinterest/doesn’t appreciate the opportunity
  - Find a champion at the college who does recognize the opportunity
  - Show evidence from success stories (e.g., Mississippi or your own stories)



# Resources

- CLASP's ATB page: <http://www.clasp.org/issues/postsecondary/pages/resources-on-ability-to-benefit>
- ED Guidance GEN-16-09
- CLASP IET Paper: <http://www.clasp.org/resources-and-publications/publication-1/WIOA-IET-Model-Programs.pdf>
- Alliance for Quality Career Pathways: <http://www.clasp.org/careerpathways>
- Career Pathways Toolkit from U.S. Department of Labor: [https://www.doleta.gov/usworkforce/pdf/career\\_pathways\\_toolkit.pdf](https://www.doleta.gov/usworkforce/pdf/career_pathways_toolkit.pdf)
- OCTAE homepage: <http://www2.ed.gov/about/offices/list/ovae/index.html>

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