

New Regulations for Ability to Benefit - What Do They Mean for California's Career Pathways?



California Council for Adult Education



Zoom etiquette 101

We can see you if your camera is on. We like to see you.

All are muted upon entry. Remain muted unless addressing a presenter or while in a breakout room during a session. We can hear you if you are not muted. Come and go, quietly.

Be engaged.

Use chat feature to ask questions.

This webinar is being recorded

A grayscale background image of a person wearing large headphones, looking intently at a laptop screen. Their hand is resting on their chin in a thoughtful pose. The image is slightly blurred, emphasizing the text overlay.

NEW REGULATIONS FOR ABILITY TO BENEFIT: WHAT DO THEY MEAN FOR CALIFORNIA'S CAREER PATHWAYS?

Judy Mortrude, World Education

02.14.2023 | 3-4 PM PT

What is ATB?

ABILITY TO BENEFIT (ATB) is an alternative path to eligibility for federal student aid for students who do not have a high school diploma or its recognized equivalent.

First, a student must fulfill one of three alternatives:

Pass an independently administered test approved by the U.S. Department of Education.

Complete 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.

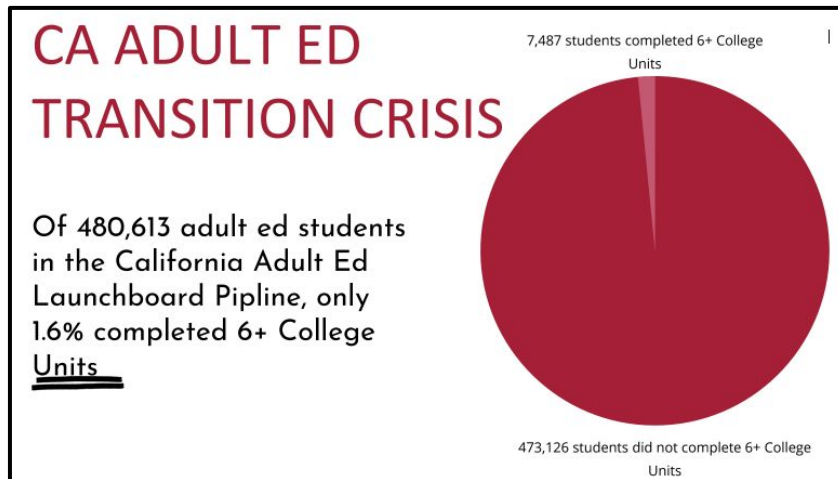
Complete a state process approved by the Secretary of Education (a “state-defined process”).

Then the student must be enrolled in an eligible career pathway program.

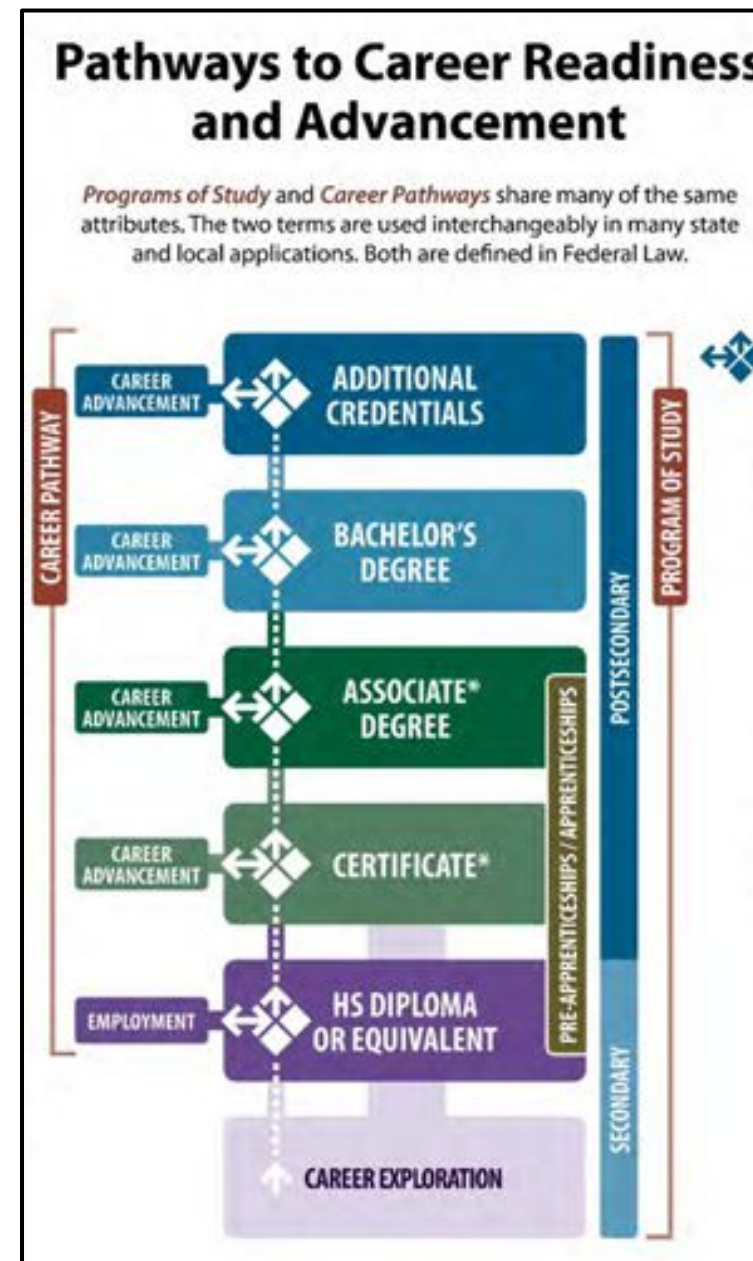
Student Eligibility

To be eligible for federal student aid, a student must **submit a FAFSA and meet all the following criteria** (34 CFR 668.32):

- Demonstrate financial need (for most financial aid 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 –*
- Have a high school diploma or a recognized equivalent; *or*
- Complete a homeschool program; *or*
- **Enroll in a career pathway program and complete one of the “Ability to Benefit” alternatives.**



[COABE ATB Symposium 2020](#) – California’s Tale of Braided Funds: Transforming State Dual Enrollment Policies



<https://cte.ed.gov/initiatives/credentials>

Why Dual Enrollment?

Dual enrollment students are more likely to...

- graduate high school
- enroll in college full-time
- maintain higher GPAs in college
- persist and complete baccalaureate degrees in four to six years

Positive effects are proportionally greater for students who are first generation and low socioeconomic status

U.S. Department of Education, Institute of Education Sciences, What Works Clearinghouse. (2017, February). Transition to College intervention report: Dual Enrollment Programs. Retrieved from <https://whatworks.ed.gov>

Offsets Opportunity Costs of Learning

Allows an adult learner to also be a
college student!

- With federal student aid, students can **work less** and likely **be more successful** in their education
- FT 2022-23 Pell Grant = \$6895
That's equivalent to working 20 hours per week over 22 weeks at \$15.50 per hour!

Findings: Barriers for Adult Learners

Time

- Working, some at multiple jobs, and many are raising children
- Lack of time exacerbates perceived and real concerns about limited parking or waiting to see a counselor
- Hard-pressed to fit courses into their schedules, especially when class times are unpredictable term-by-term

Money

- Worried about going into debt and whether additional education will lead to better paying jobs
- Childcare (availability and affordability) is a dominating concern

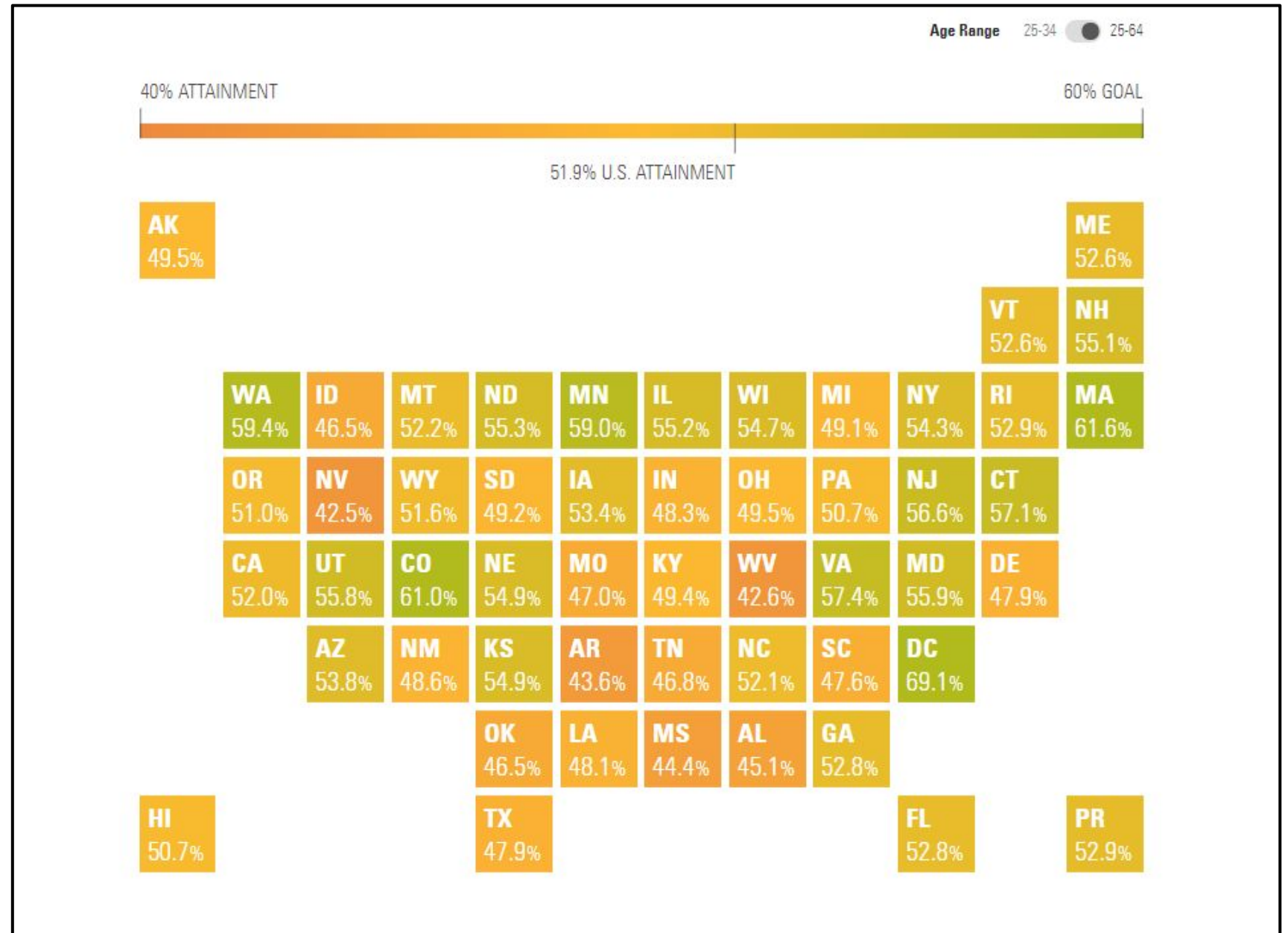


Findings: Ranking Support Services (continued)

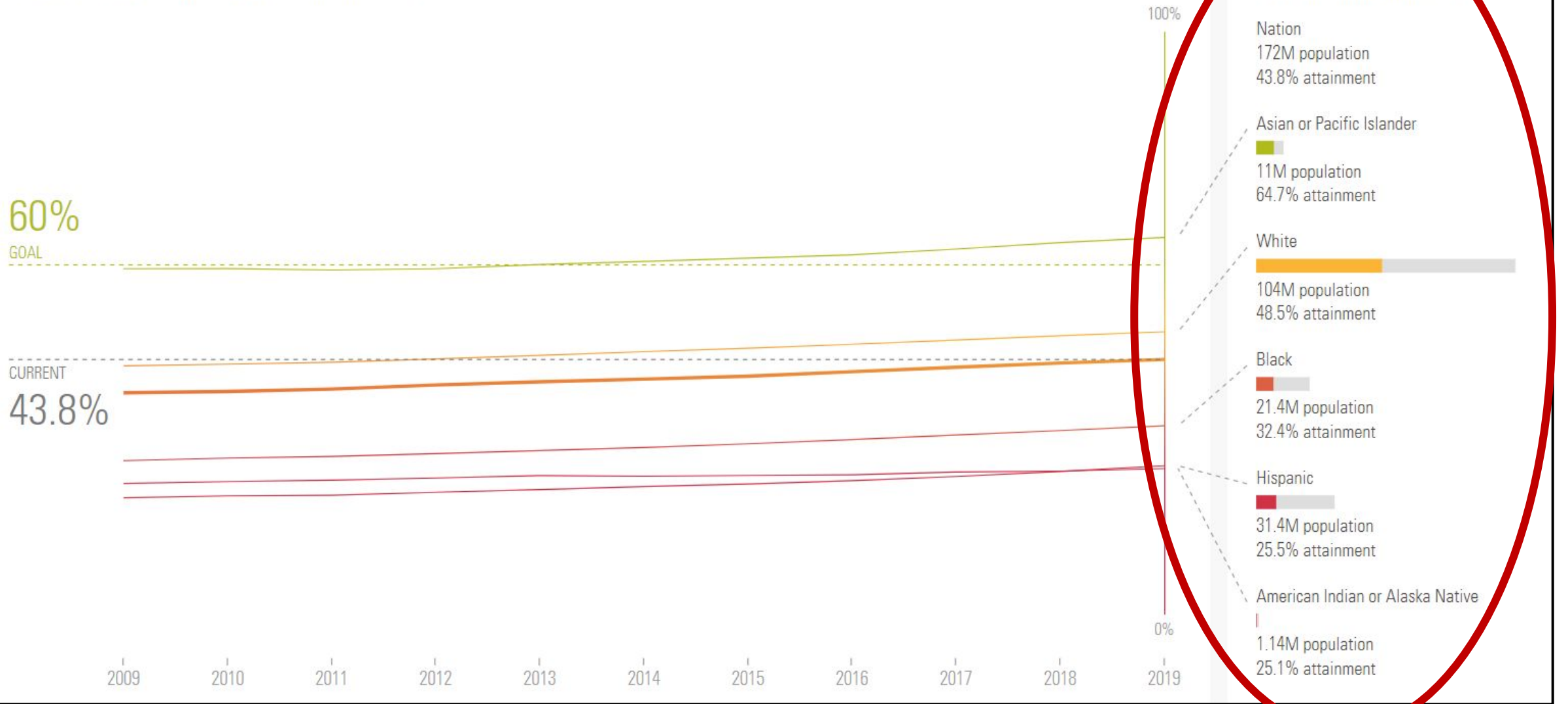
Ranked as most important:

1. Financial aid (50%)
2. Counseling about required courses by degree (41%)
3. Apprenticeships, internships, and other work-based learning opportunities to achieve immediately applicable job skills (37%)
4. Online courses (32%)
5. Food, childcare, or other benefits for student parents (26%)
6. Taking assessments to get credit for what they already know (25%)
7. Tutoring, counseling, or other supports for low-income learners (22%)
8. Professors trained in teaching both high-achieving and low-achieving learners (10%)
9. Enroll directly into transfer-level English and Math without taking a placement test (4%)
10. Resource center for veteran or active duty/reserves military learners (3%)
11. Education for people in prison (3%)

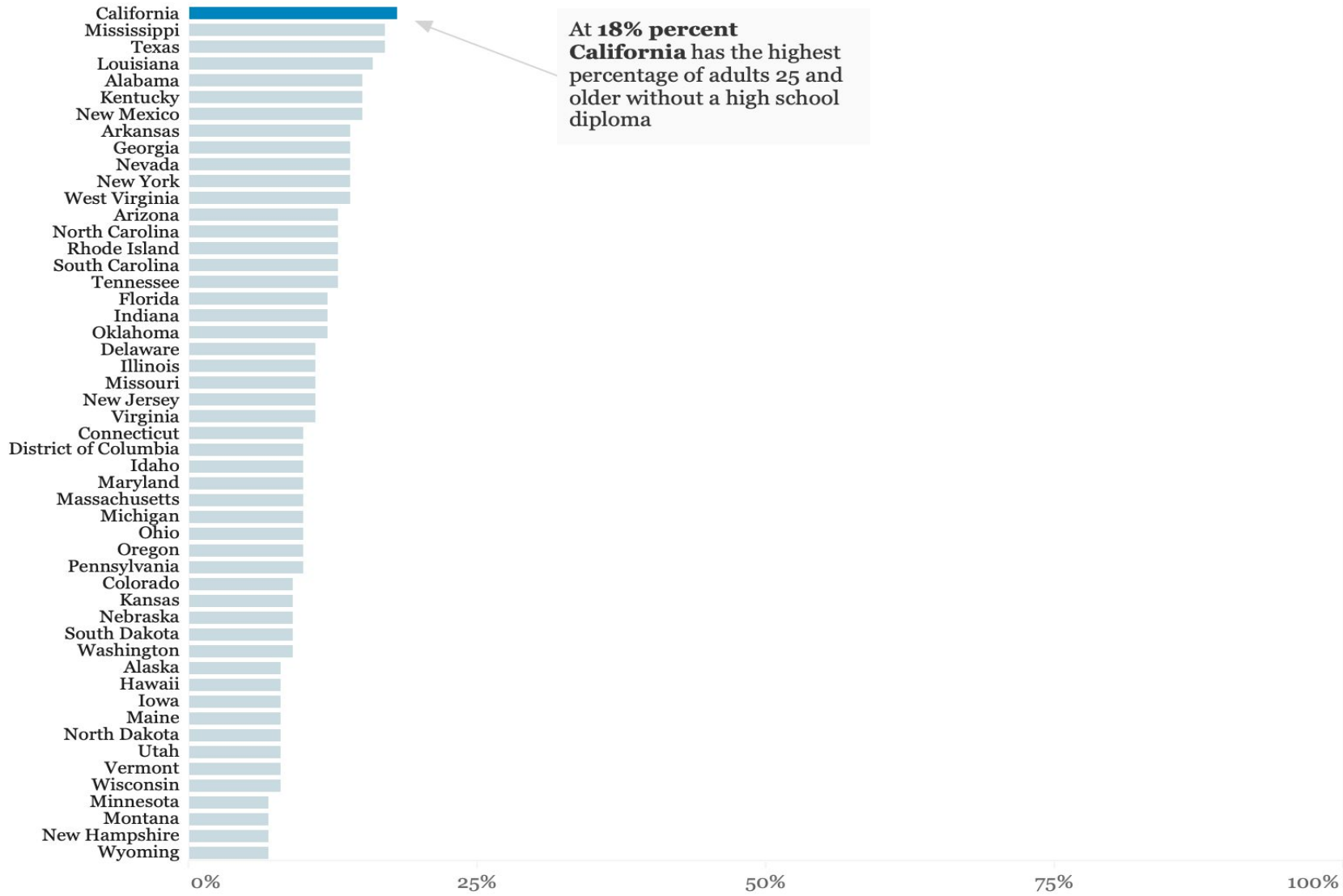
Progress Toward Postsecondary Educational Goals 2009-2019



NATIONAL ATTAINMENT BY RACE AND ETHNICITY 2009-2019



Percent of Population with Less than a High School Diploma



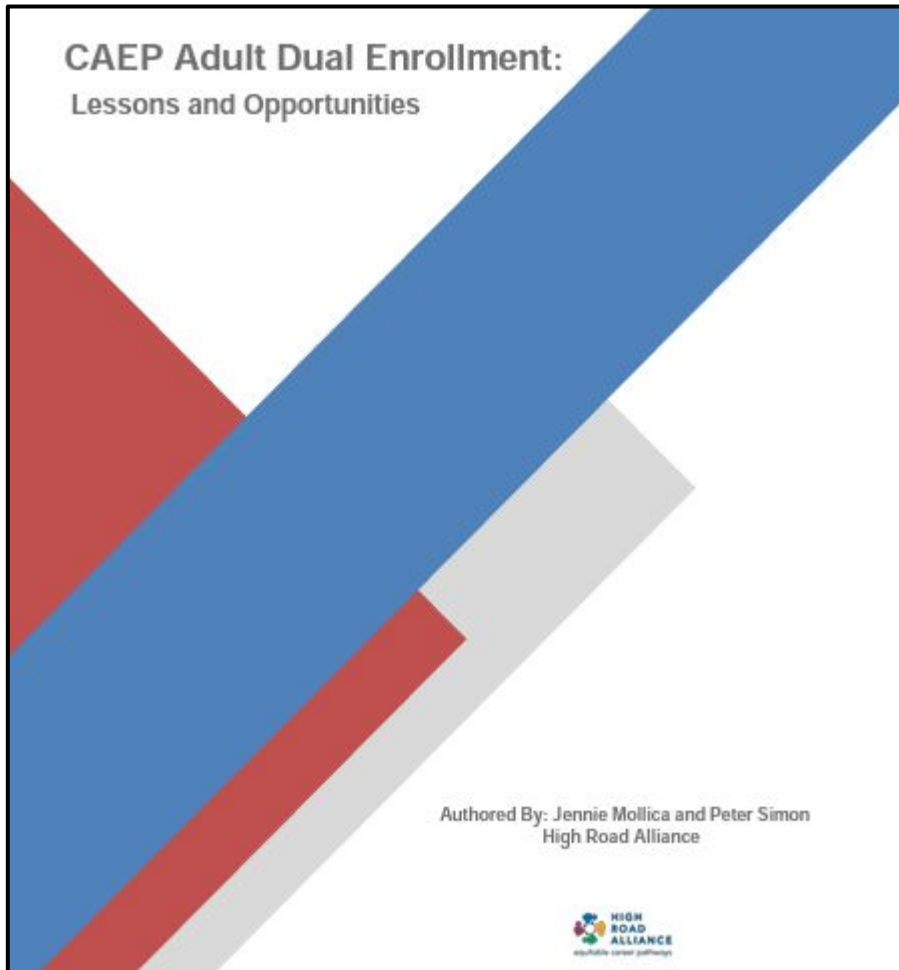
Source: American Community Survey 2013-2017 5-year estimates

Note: Excludes Puerto Rico



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CA Adult Dual Enrollment



SB 554 (2019)

Adults enter CCC under “special admit” status – up to 11 units per semester

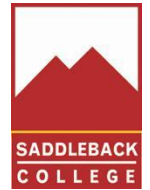
<https://www.caedge.org/new-report-dual-enrollment-in-california-adult-education-and-community-colleges-lessons-and-opportunities/>

Developing Career Capital in Adult Education Pathways

POWERED BY



California
Community
Colleges



Accelerate Transitions

- Collaborate with regional partners to expand dual enrollment in adult education (Ability-to-Benefit, SB 554)
- Support development and implementation of Ability-to-Benefit for adult dual enrollment
- Promote the award of credit for industry credentials.

User's Guide for ATB and Adult Dual Enrollment



October 2020

Bootstraps to Share:

A User Guide for Ability to Benefit and Adult Dual Enrollment

This is a confidential draft. Please do not publish, cite, or disseminate it.



Basecamp-Free Virtual Community of Practice

Dual Enrollment Community of Practice

The Dual Enrollment Community of Practice basecamp group, open to dual enrollment practitioners at high schools and community colleges in California, serves as a communication and exchange tool in support of student success and equity. This basecamp team is hosted and facilitated by Career Ladders Project.

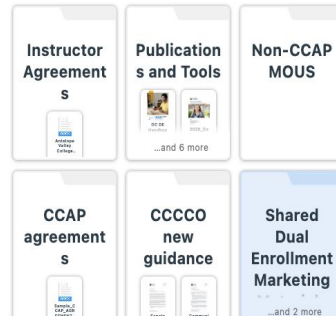
people



Message Board

- EF CLP Update: Strengthening Student Success Conference 2022
- EF From The University of Utah: Research Priorities for Advancing
- EF From The Education Trust-West: Education Equity Forum 2022.
- EF The Latest Update From CLP- Dual Enrollment Student Voice: Set Up for
- DS Dual Enrollment Classes and UC A-G Status 2
- EF Repost from the California Community

Docs & Files



Schedule



Automatic Check-ins

Asking 163 people every other Thursday at 9:50am.
Share some good news with us about how dual enrollment is going!



Adult Dual Enrollment - Community of Practice

A place to connect virtually and share resources, challenges and approaches to creating dual enrollment partnerships for adults who are taking college courses while working on a GED or HSE.

Set up people



Message Board



Post announcements, pitch ideas, progress updates, etc. and keep feedback on-topic.

To-dos



Make lists of work that needs to get done, assign items, set due dates, and discuss.

Docs & Files



Share docs, files, images, and spreadsheets. Organize in folders so they're easy to find.

Campfire



Schedule



Automatic Check-ins



Why Use Ability to Benefit?

Postsecondary Goals

State postsecondary rates –
disaggregated by race

Equity

Adult learners served equitably

Evidence-Based

Integrated Education & Training;
Career Pathways

Alignment

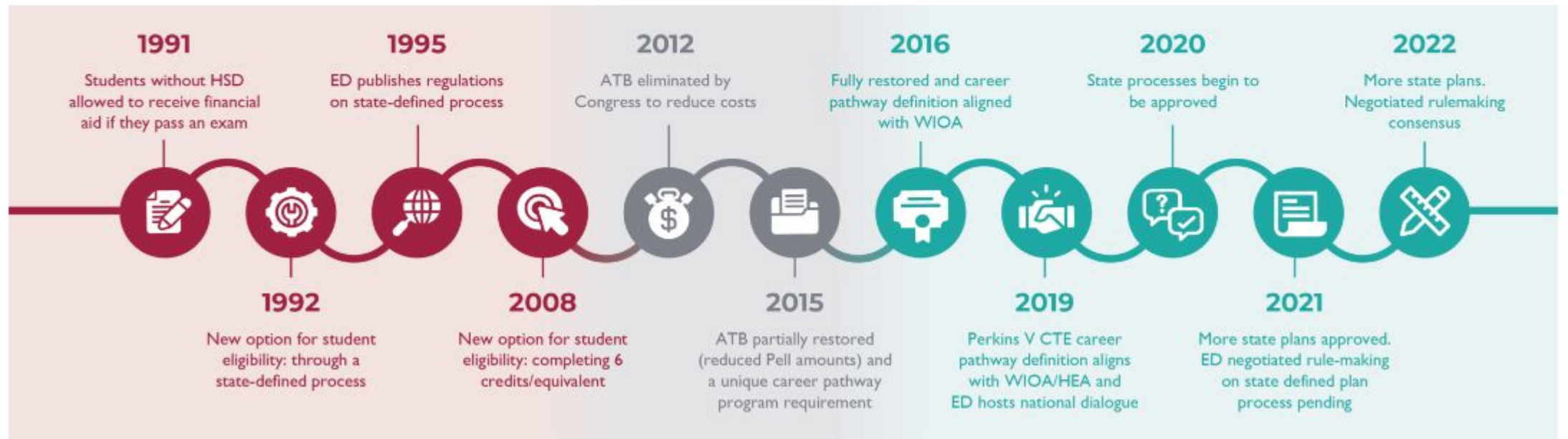
HEA / WIOA / Perkins CTE

Sustainability

Pell Grant, federal student aid

Ability to Benefit

EVOLUTION CONFUSION PROGRESS



<https://www.collegetransition.org/career-pathways/featured-projects/ability-to-benefit/>

Approved ATB Tests

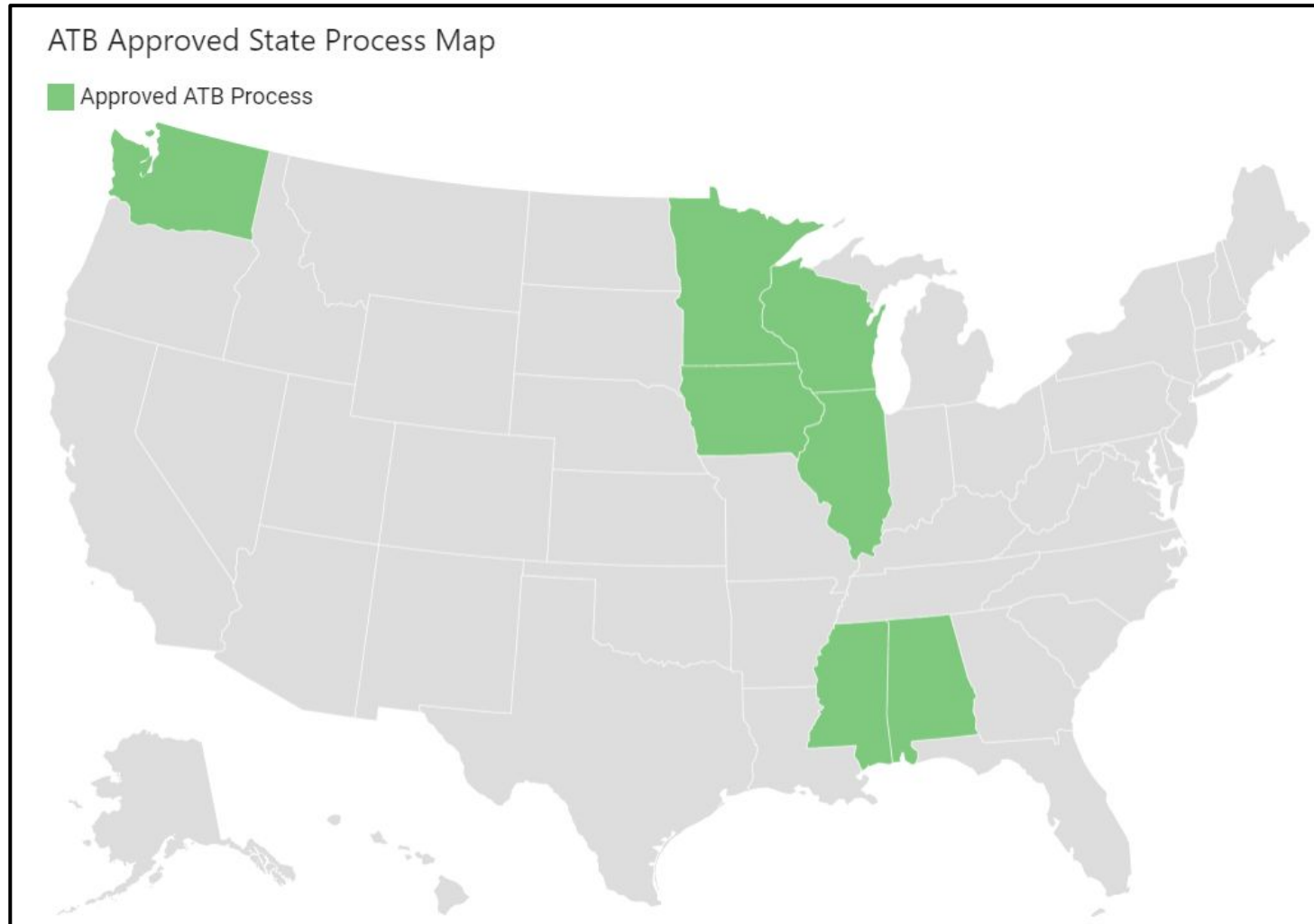
ATB test	Passing scores	Test publisher contact information
Wonderlic Basic Skills Test (WBST) Verbal Forms VS-1 & VS-2, Quantitative Forms QS-1 & QS-2 Paper and pencil versions and online versions. Effective Date: July 1, 2015	Verbal (200) Quantitative (210)	Wonderlic, Inc., 400 Lakeview Parkway, Suite 200 Vernon Hills, IL 60061. Contact: Chris Young. Telephone: (847) 247-2544. Fax: (847) 680-9492.
Spanish Wonderlic Basic Skills Test (Spanish WBST) Verbal Forms VS-1 & VS-2, Quantitative Forms QS-1 & QS-2 Paper and pencil versions and online versions. Effective Date: July 1, 2015	Verbal (200), Quantitative (200)	
Combined English Language Skills Assessment (CELSA),* Forms 1 and 2 Effective Date: November 1, 2002	CELSA Form 1 (97), CELSA Form 2 (97)	Association of Classroom Teacher Testers (ACCT), 1187 Coast Village Road, Suite 1, #378, Montecito, CA 93108. Contact: Pablo Buckelew. Telephone: (805) 965-5704. Fax: (805) 965-5807.
ACCUPLACER Computer-adaptive tests and COMPANION ACCUPLACER Forms J and K: Reading Test, Writing Test, and Arithmetic Test	Reading Test (233), Writing Test (235),** Arithmetic Test (230) **	The College Board, 250 Vesey Street, New York, NY 10281. Contact: ACCUPLACER Program. Telephone: (800) 607-5223. Fax: (212) 253-4061.
** Texas Success Initiative (TSI) Assessment—Computer-adaptive tests and COMPANION TSI Forms T and V: Reading Placement Test, Writing Placement Test, Mathematics Placement Test	Reading Placement Test (336), Writing Placement Test (345), Mathematics Placement Test (326)	
* Note: As provided in 34 CFR 668.153(a)(2) , the CELSA test is approved as the additional ATB English language proficiency test that must be taken by students whose native language is not English and who are not fluent in English if the academic program includes an ESL component.		
** The ACCUPLACER test has been redesigned since it was listed as an approved test in the 2006 notice. TSI is a new addition to the list of approved ATB tests. These tests are provisionally approved. To move from provisional approval to full approval the test publisher must submit additional information as noted in the test agreement signed by the test publisher and the Department, no later than two years from the effective date of the agreement 6/26/2020. In the even the Department denies full approval, we will provide notice of this through publication in the Federal Register , pursuant to 34 CFR 668.150(c)(3) .		

<https://www.federalregister.gov/documents/2020/11/09/2020-24795/list-of-approved-ability-to-benefit-atb-tests-and-passing-scores>

Credit Alternative

“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 Process Alternative



U.S. Dept of Education –
State Process Webinar
Slides:

<https://ifap.ed.gov/dear-colleague-letters/ann2002>

Questions?
atbstateprocess@ed.gov

ATB Enrollment & Disbursement by Award Year

Award Year	Total		Pell Grant	
	Enrollment	\$ Disbursed	Enrollment	Disbursed
2016	124,238	\$ 1,000,604,160	84,437	\$ 314,203,711
2017	88,713	\$ 704,246,272	64,806	\$ 238,900,653
2018	76,073	\$ 621,509,504	57,058	\$ 220,905,326
2019	68,963	\$ 556,488,384	52,460	\$ 210,323,828
2020	64,406	\$ 524,974,080	49,915	\$ 206,775,876
2021	58,679	\$ 447,029,568	46,171	\$ 191,999,538

<https://www2.ed.gov/policy/highered/reg/hearulemaking/2021/atbusagedata.xlsx>

ATB Enrollment & Disbursement by IHE Type

Award Year	Public		Private Nonprofit		Private For-Profit	
	Enrollment	\$ Disbursed	Enrollment	\$ Disbursed	Enrollment	\$ Disbursed
2016	83,788	\$ 616,565,952	26,980	\$ 276,638,144	13,182	\$ 101,470,536
2017	57,732	\$ 427,185,120	18,929	\$ 185,153,136	11,979	\$ 91,230,000
2018	47,423	\$ 354,119,392	15,795	\$ 160,284,848	12,798	\$ 106,640,024
2019	43,776	\$ 326,516,608	12,564	\$ 126,979,720	12,574	\$ 102,565,168
2020	40,845	\$ 301,642,304	9,591	\$ 98,775,408	13,892	\$ 123,566,840
2021	36,611	\$ 251,398,992	7,002	\$ 69,387,024	14,998	\$ 125,558,864

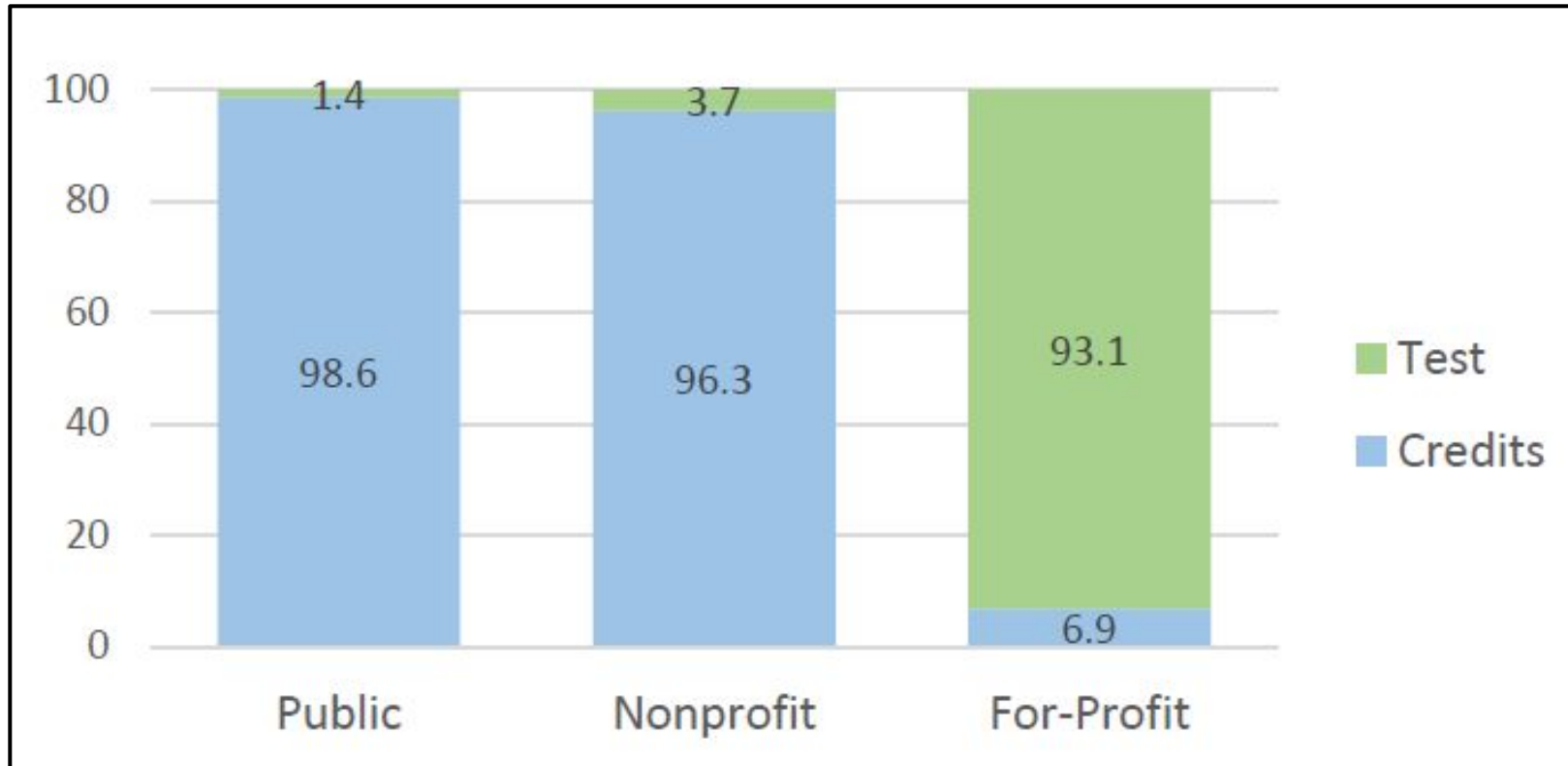
<https://www2.ed.gov/policy/highered/reg/hearulemaking/2021/atbusagedata.xlsx>

ATB Enrollment & Disbursement by Option

Award Year	ATB Student by Earning At Least 6 Credits		ATB Student by Test	
	Enrollment	\$ Disbursed	Enrollment	Disbursed
2016	112,341	\$ 920,737,600	11,916	\$ 79,866,560
2017	75,558	\$ 614,110,976	13,169	\$ 90,135,304
2018	62,174	\$ 515,644,384	13,928	\$ 105,865,112
2019	55,742	\$ 456,198,368	13,232	\$ 100,290,072
2020	50,203	\$ 403,399,936	14,206	\$ 121,574,160
2021	43,933	\$ 327,537,312	14,755	\$ 119,492,280

<https://www2.ed.gov/policy/highered/reg/hearulemaking/2021/atbusagedata.xlsx>

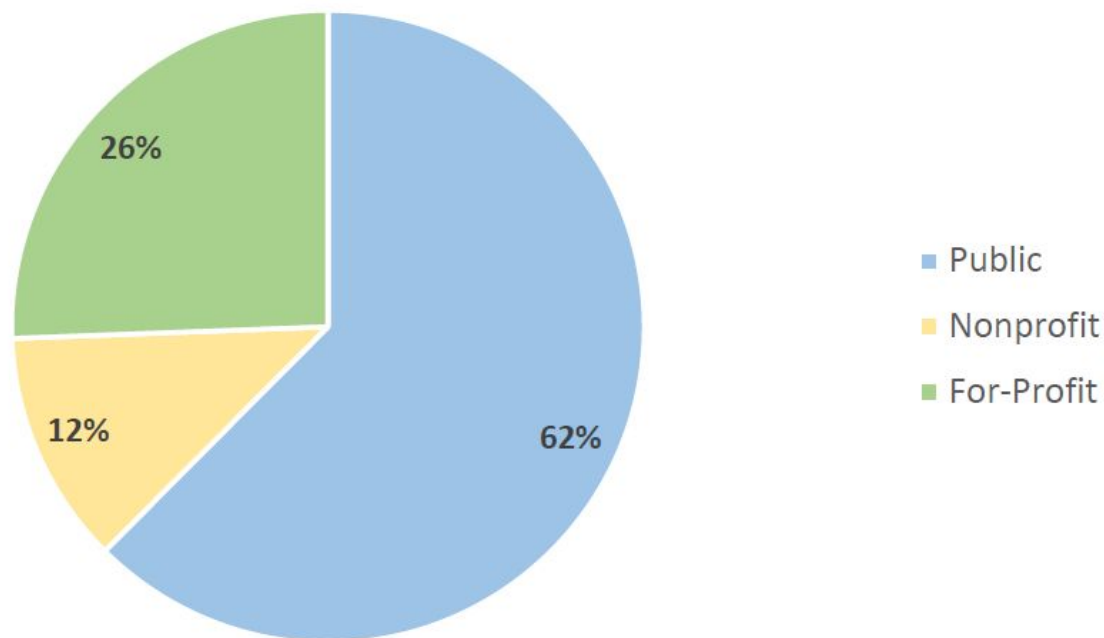
For-Profits Use the Test Option



<https://www2.ed.gov/policy/highered/reg/hearulemaking/2021/analysisofatbusage.pdf>

Public Use is Greatest – But Not Proportionate

Figure 1: Ability to Benefit Enrollment, by Control, for AY 2021



<https://www2.ed.gov/policy/highered/reg/hearulemaking/2021/analysisofatbusage.pdf>

An Eligible Career Pathway

... is 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;

Shared definition
across 3 federal
education laws:

- 1. HEA
- 2. WIOA
- 3. Perkins V

An Eligible Career Pathway

- D. 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;
- E. 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;

An Eligible Career Pathway

- D. 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;
- E. 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;



Integrated
Education
and
Training
(IET)

Integrated Education & Training

The Institute for Education Science (IES) What Works Clearinghouse (WWC) confirms IET as an evidence-based practice.

Gold standard research identified three random control trial studies that meet the WWC criteria, documenting impacts on 45,413 students in nine states and demonstrating –

- +18 positive effects on industry-recognized credential, certificate, or license completion

- +10 potentially positive effects on short-term employment

An Eligible Career Pathway

- 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**.

Eligible Career Pathway Program

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

- Some colleges have used this optional checklist from OCTAE to help document their programs' eligibility: <https://lincs.ed.gov/publications/topic/wioa/career-pathways-checklist.pdf>

Eligible Career Pathway Program

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

- Some colleges have used this optional checklist from OCTAE to help document their programs' eligibility: <https://lincs.ed.gov/publications/topic/wioa/career-pathways-checklist.pdf>

§ 668.157 Eligible Career Pathway Program

(a) An institution demonstrates to the Secretary that a student is enrolled in an eligible career pathway program by documenting that –

(1) The student has enrolled in or is receiving **all three of the following elements simultaneously** –

(i) An eligible postsecondary program as defined in § 668.8

(ii) **Adult education and literacy activities under the Workforce Innovation and Opportunity Act as described in 34 CFR 463.30 that assist adults in attaining a secondary school diploma or its recognized equivalent and in the transition to postsecondary education and training; and**

(iii) **Workforce preparation activities as described in 34 CFR § 463.34.**

(2) The program aligns with the skill needs of industries in the State or regional labor market in which the institution is located, based on research the institution has conducted, including –

(i) Government reports identifying **in-demand occupations** in the State or regional labor market;

(ii) Surveys, interviews, meetings, or other information obtained by the institution regarding the hiring needs of employers in the State or regional labor market; **and**

(iii) **Documentation that demonstrates direct engagement with industry.**

§ 668.157 Eligible Career Pathway Program

(3) The skill needs described in paragraph (a)(2) of this section align with the specific coursework and postsecondary credential provided by the postsecondary program or other required training;

(4) The program provides **academic and career counseling services** that assist students in **pursuing their credential** and obtaining jobs aligned with skill needs described in paragraph (a)(2) of this section, and identifies the individuals providing the career counseling services;

(5) The **appropriate** education is offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster **through an agreement, memorandum of understanding, or some other evidence of alignment of postsecondary and adult education providers that ensures the secondary education is aligned with the students' career objectives; and**

§ 668.157 Eligible Career Pathway Program

(6) The program is designed to lead to a valid high school diploma as defined in § 668.16(pv) of this part or its recognized equivalent.

(b) For career pathway programs that do not enroll students through a State process as defined in § 668.156, the **Secretary** will verify the eligibility of eligible career pathway programs for title IV, HEA program purposes pursuant to **paragraph (a) of this section**. The Secretary provides an institution with the opportunity to appeal any adverse eligibility decision.



Ability to Benefit Resource Page - NCTN

www.collegetransition.org



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Resources

ATB Resource Page – all you need!

<https://www.collegetransition.org/career-pathways/feature-d-projects/ability-to-benefit/resource-page/>

Interested in commenting on the proposed regulations? Email me!

[Judy Mortrude@worlded.org](mailto:Judy_Mortrude@worlded.org)



on my college degree.
Ability to Benefit functions kind of like

WESLEY

CRIMINAL JUSTICE

FORENSIC PSYCHOLOGY

1:39 / 5:33

<https://www.youtube.com/watch?v=L2oBNNTjaCE>

A black and white photograph of a classroom. In the foreground, a desk holds an open notebook and a smartphone. In the background, several students have their hands raised, suggesting an interactive session or a Q&A period.

THANK YOU!

Judy_Mortrude@worlded.org

Next steps for Ability to Benefit



California Council for Adult Education

