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

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Maintain satisfactory academic progress</th>
<th>Sign the certification statement on the Free Application for Federal Student Aid (FAFSA®), and –</th>
</tr>
</thead>
<tbody>
<tr>
<td>Demonstrate financial need (for most financial aid programs);</td>
<td></td>
<td>Have a high school diploma or a recognized equivalent; <strong>or</strong></td>
</tr>
<tr>
<td>Be a U.S. citizen or an eligible noncitizen;</td>
<td></td>
<td>Complete a homeschool program; <strong>or</strong></td>
</tr>
<tr>
<td>Have a valid Social Security number;</td>
<td></td>
<td>Enroll in a career pathway program and complete one of the “Ability to Benefit” alternatives.</td>
</tr>
<tr>
<td>Be registered with Selective Service (males);</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Be enrolled or accepted for enrollment as a regular student in an eligible degree or certificate program;</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

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

https://luminafoundation.org/stronger-nation/report/#/progress
NATIONAL ATTAINMENT BY RACE AND ETHNICITY 2009-2019

2019 POPULATION STATISTICS

- Nation
  - 172M population
  - 43.8% attainment

- Asian or Pacific Islander
  - 11M population
  - 64.7% attainment

- White
  - 104M population
  - 48.5% attainment

- Black
  - 21.4M population
  - 32.4% attainment

- Hispanic
  - 31.4M population
  - 25.5% attainment

- American Indian or Alaska Native
  - 1.14M population
  - 25.1% attainment

https://luminafoundation.org/stronger-nation/report/#/progress/racial_equity
Percent of Population with Less than a High School Diploma

At 18% percent California has the highest percentage of adults 25 and older without a high school diploma.

Source: American Community Survey 2013-2017 5-year estimates
Note: Excludes Puerto Rico
CA Adult Dual Enrollment

SB 554 (2019)
Adults enter CCC under “special admit” status – up to 11 units per semester

Developing Career Capital in Adult Education Pathways

- 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.

CLP | Career Ladders Project
User’s Guide for ATB and Adult Dual Enrollment
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.

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

Docs & Files
- Instructor Agreement
- Publication and Tools
- Non-CCAP MOU
- CCAP agreements
- CCCC new guidance
- Shared Dual Enrollment Marketing

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.

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
## Approved ATB Tests

<table>
<thead>
<tr>
<th>ATB test</th>
<th>Passing scores</th>
<th>Test publisher contact information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish Wonderlic Basic Skills Test (Spanish WBST) Verbal Forms VS-1 &amp; VS-2, Quantitative Forms QS-1 &amp; QS-2 Paper and pencil versions and online versions. Effective Date: July 1, 2015</td>
<td>Verbal (200), Quantitative (200)</td>
<td>-</td>
</tr>
<tr>
<td>Combined English Language Skills Assessment (CELSA),* Forms 1 and 2 Effective Date: November 1, 2002</td>
<td>CELSA Form 1 (97), CELSA Form 2 (97)</td>
<td>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.</td>
</tr>
<tr>
<td><strong>ACCUPLACER Computer-adaptive tests and COMPANION ACCUPLACER Forms J and K: Reading Test, Writing Test, and Arithmetic Test</strong></td>
<td>Reading Test (233),** Writing Test (235),** Arithmetic Test (230)**</td>
<td>The College Board, 250 Vesey Street, New York, NY 10281. Contact: ACCUPLACER Program. Telephone: (800) 607-5223. Fax: (212) 253-4061.</td>
</tr>
<tr>
<td>** Texas Success Initiative (TSI) Assessment—Computer-adaptive tests and COMPANION TSI Forms T and V: Reading Placement Test, Writing Placement Test, Mathematics Placement Test</td>
<td>Reading Placement Test (336), Writing Placement Test (345), Mathematics Placement Test (326)</td>
<td>-</td>
</tr>
</tbody>
</table>

*Note:* As provided in 34 CFR 668.150(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. In the event 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).**

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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

ATB Approved State Process Map

Approved ATB Process

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

Questions?
atbstateprocess@ed.gov
## ATB Enrollment & Disbursement by Award Year

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

# ATB Enrollment & Disbursement by IHE Type

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

## ATB Enrollment & Disbursement by Option

<table>
<thead>
<tr>
<th>Award Year</th>
<th>ATB Student by Earning At Least 6 Credits</th>
<th>ATB Student by Test</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Enrollment</td>
<td>$ Disbursed</td>
</tr>
<tr>
<td>2016</td>
<td>112,341</td>
<td>$920,737,600</td>
</tr>
<tr>
<td>2017</td>
<td>75,558</td>
<td>$614,110,976</td>
</tr>
<tr>
<td>2018</td>
<td>62,174</td>
<td>$515,644,384</td>
</tr>
<tr>
<td>2019</td>
<td>55,742</td>
<td>$456,198,368</td>
</tr>
<tr>
<td>2020</td>
<td>50,203</td>
<td>$403,399,936</td>
</tr>
<tr>
<td>2021</td>
<td>43,933</td>
<td>$327,537,312</td>
</tr>
</tbody>
</table>

For-Profits Use the Test Option

Public Use is Greatest – But Not Proportionate

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

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 & 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.
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
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
§ 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.

Resources

ATB Resource Page – all you need!

Interested in commenting on the proposed regulations? Email me!
Judy_Mortrude@worlded.org
on my college degree. Ability to Benefit functions kind of like
THANK YOU!

Judy_Mortrude@worlded.org
Next steps for Ability to Benefit