

# Ability-to-Benefit (AtB): Developing a Toolkit for Texas

Texas Pathways Pre-Institute  
11.14.22







**Good Morning!  
Glad You're Here**



Texas Success Center

# Agenda



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## Activity One

Introduction &

Establish Common Understanding (**10:00 AM- 10:30 AM**)

## Activity Two

Sharing Fellowship AtB Research (**10:30 AM- 11:00 AM**)

## Activity Three

Building the Texas Toolkit: Integrating Adult Education in Community College Systems (**11:00- AM-11:40 AM**)

## Lunch

**11:45 AM – 12:15 AM**

## Activity Four

Building the Texas Toolkit: Sharing and Collecting Valuable Experiences and Knowledge. (**12:20 PM-1:30 PM**)

# Speakers



**Dr. Russell Lowery-Hart**  
President, Amarillo College



**Dr. Tamara Clunis**  
Vice President Academic Affairs,  
Amarillo College



**Michelle Lamons**  
Director AEL, Amarillo College

# Speakers



**Kathy Dowdy**

Executive Director AEL, Austin  
Community College



**Deon Hope**

Career Pathways Supervisor, Amarillo  
College



**Judy Mortrude**

Special Guest, Senior Technical  
Advisor, World Education, Inc





# Establishing A Common Understanding



# Who's Eligible for Federal Aid?

## 🎵 Basic Eligibility Criteria

Our basic eligibility requirements are that you must

- demonstrate financial need for need-based federal student aid programs;
- be a U.S. citizen or an eligible noncitizen;
- have a valid Social Security number (with the exception of students from the Republic of the Marshall Islands, Federated States of Micronesia, or the Republic of Palau);
- be enrolled or accepted for enrollment as a regular student in an eligible degree or certificate program;
- be enrolled at least half-time to be eligible for Direct Loan Program funds;
- maintain satisfactory academic progress in college or career school;
- sign the certification statement on the *Free Application for Federal Student Aid* (FAFSA®) form stating that you're not in default on a federal student loan, you do not owe money on a federal student grant, and you'll only use federal student aid for educational purposes; and
- show you're qualified to obtain a college or career school education.

”



# Show You're Qualified to Obtain a College or Career School by...



- ”
- having a high school diploma or a state-recognized equivalent such as a General Educational Development (GED) certificate;
  - completing a high school education in a homeschool setting approved under state law (or—if state law does not require a homeschooled student to obtain a completion credential—completing a high school education in a homeschool setting that qualifies as an exemption from compulsory attendance requirements under state law); or
  - enrolling in an eligible career pathway program and meeting one of the “ability-to-benefit” alternatives described below.”





# Ability to Benefit (AtB)...What is it?

- Ability to Benefit is a federal provision enacted by the Higher Education Act (HEA) that allows students without a high school diploma or high school equivalency to **gain access to federal financial aid** to “obtain a college or career school education” by **proving** the ability-to-benefit from one of the AtB Alternatives while enrolled into an eligible career pathway program (2012 ECPP exception)
  - **THREE AtB ALTERNATIVES**



# THREE AtB ALTERNATIVES

The ATB alternatives include:

- Passing an independently administered Department of Education approved ATB test (see chart at the end of this section).
- Completing at least six 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.
- Completing a state process approved by the Secretary of Education. Note: To date, state processes have been approved by the Secretary for the states of Washington, Illinois, Iowa, Mississippi, and Wisconsin.





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# Creating Partnerships: Eligible Career Pathways Seven Components

WIOA Career Pathway definition was adopted by the Department of Education in 2016. This adoption can assist in better alignment between adult education programs and community college systems.



## **Activity Two:** **Sharing Fellowship AtB Research**

April 2021-Current



# Background: Amarillo College AtB Efforts



- ADULT EDUCATION COLLEGE INTEGRATION
  - 2015-CURRENT
  - WON THREE CONSECUTIVE TWC PERFORMANCE AWARDS
- LEAD 17 COMMUNITY COLLEGES: TEXAS PEER MENTOR NETWORK
  - 2016-2020...LEARNING FROM AND WITH EACH OTHER
- TEXAS PATHWAYS PRESENTERS
  - FALL 2021, SPRING 2022, FALL 2022
- TEXAS SUCCESS CENTER KNOWLEDGE FELLOW & MENTOR
  - 2021-CURRENT...RESEARCH AND PUBLICATION ON AtB
- WORLD EDUCATION AtB PARTNERSHIP
  - 2022-CURRENT...DEVELOP AN AtB STATE-DEFINED PROCESS

# Research Methodologies

- Reviewed Journals
- Federal Guidance Letters
- Community College Surveys
  - Austin Community College
  - Houston Community College
  - Paris Junior College
  - Amarillo College
- Community College Interviews
  - Austin Community College
  - Paris Junior College
  - Houston Community College
  - Laredo College
  - Amarillo College
- Zoom Recordings Approved State-Defined AtB Alternative
  - Washington State
  - Mississippi
  - Wisconsin







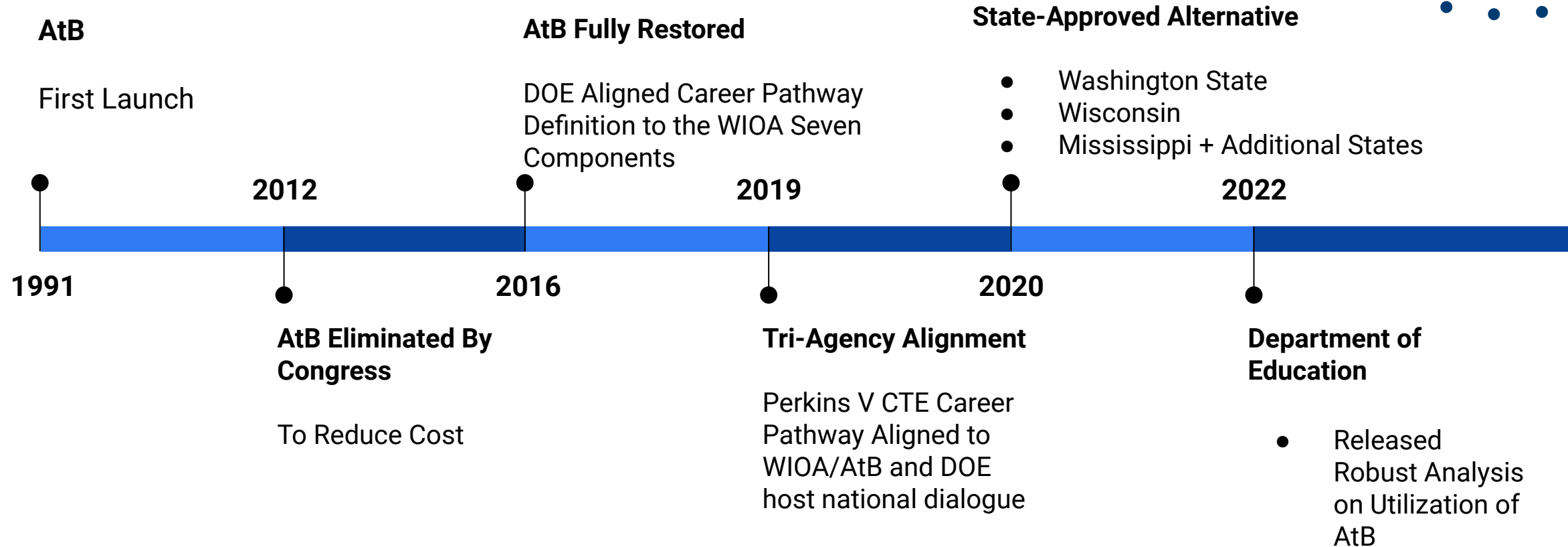
**Michelle Lamons**  
Director AEL, Amarillo College

# AtB Research Findings





# AtB Timeline





## UNDERUTILIZED?

Significant decline in the use of AtB from 2016-2021 for public & non-profit organizations

According to DOE public & non-profit institutions utilize the 6-SCH AtB Alternative = More Expensive Alternative Pathway

The data in Table 3 break out the pathways by which students become eligible for aid through ability to benefit: either by earning at least 6 college credits, or by passing an approved exam. (The state process is not included here because the Department does not yet track eligibility through the state process.) Overall, more students have become ATB students by first earning college credits (three-quarters of ATB students in AY 2021). However, the balance has shifted in recent years; in 2016, 90 percent of ATB students used the credits-earned pathway, compared with 10 percent using the exam; in AY 2021, one in four used the exam.

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

**Figure 2: ATB Enrollment Pathway, By Control, for AY 2021**

There are also variations by sector in how students become eligible for Title IV aid as ATB students. While most students in the nonprofit and public sectors have become eligible via the credit-hours requirement, the vast majority in the for-profit sector instead utilize the test.



**Table 4: AY 2021 Ability to Benefit Enrollment and Disbursements, by State**



## California and Florida Have Robust AtB Models and Could Share Knowledge and Experiences

This table describes the state-level enrollment and disbursement of aid to ATB students, as well as the number of institutions who have ATB students, by state for AY 2021.

State	TOTAL		
	Enrollment	\$ Disbursed	# of Institutions with ATB Students
AK	Suppressed	Suppressed	1
AL	85	\$ 714,370	9
AR	464	\$ 3,388,172	11
AZ	65	\$ 359,146	21
CA	30,462	\$ 218,371,696	174
CO	2,295	\$ 19,196,722	16
CT	62	\$ 629,176	7
DC	52	\$ 499,150	1
DE	13	\$ 171,739	1
FL	12,102	\$ 87,749,224	40
GA	174	\$ 1,687,316	11
HI	Suppressed	Suppressed	2
IA	86	\$ 802,324	11
ID	17	\$ 104,613	7
IL	590	\$ 4,294,620	31
IN	71	\$ 565,956	15
KS	238	\$ 1,243,471	8
KY	436	\$ 4,329,077	10
LA	880	\$ 8,224,835	16
MA	96	\$ 861,581	19
MD	539	\$ 4,590,664	21
ME	473	\$ 3,749,209	7
MI	447	\$ 2,872,059	36
MN	232	\$ 2,315,288	15



Texas Aggregated AtB  
2021 Award Year Data

A  
Whopping  
1,386

MO	408	\$ 3,596,123	24
MS	106	\$ 766,593	7
MT	18	\$ 143,668	4
NC	237	\$ 2,600,966	15
ND	14	\$ 100,849	6
NE	15	\$ 146,776	5
NH	Suppressed	Suppressed	0
NJ	266	\$ 2,327,507	17
NM	67	\$ 456,669	5
NV	23	\$ 240,997	4
NY	3,118	\$ 30,916,654	49
OH	468	\$ 3,712,218	24
OK	56	\$ 576,251	11
OR	88	\$ 661,927	16
PA	203	\$ 2,421,037	28
PR	115	\$ 854,560	4
RI	53	\$ 620,400	3
SC	1,114	\$ 10,408,923	16
SD	Suppressed	Suppressed	3
TN	150	\$ 1,367,049	9
TX	1,386	\$ 10,883,314	79
UT	71	\$ 485,080	8
VA	189	\$ 1,915,003	14
VT	37	\$ 348,296	6
WA	257	\$ 1,886,878	31
WI	82	\$ 584,790	16
WV	178	\$ 1,521,285	6
WY	Suppressed	Suppressed	0





Texas Aggregated AtB  
Award Data

2016-2021

Table 3: Ability-to-Benefit (ATB) Student Counts and Awards by Award Year and State

Award Year	State	Total		
		<i>Count</i>	<i>Awarded</i>	<i>Disbursed</i>
2016	TX	4,058	\$36,548,896	\$33,980,672
2017	TX	3,553	\$32,105,188	\$29,808,648
2018	TX	3,787	\$34,478,184	\$31,343,534
2019	TX	3,068	\$27,165,064	\$24,757,164
2020	TX	2,255	\$20,708,506	\$19,045,398
2021	TX	1,386	\$11,777,263	\$10,883,314



Diagnosed Reasons IHE  
are Not Utilizing AtB

- Lack of Awareness of Ability to Benefit... What is AtB and How Do You Access?
- Resources to Fund AtB 6-SCH
- No Access to State-Approved Test Options
- Are the Correct AtB Fund Codes Being Applied?
- Fear of Audit Findings
- Challenging...Difficult, Requires Continuous Dedicated Collaborative Efforts Of Adult Education Integration.





# **Possible Solutions to Diagnosed Underutilization of AtB**



## 6-SCH Funding Options

- AEFLA Title II Funds: WIOA Federally Funded Adult Education Programs
- **Reduced/No Cost**
- Workforce Boards WIOA Title I Individual Training Account (ITA)
- Perkins Innovative Practices
- Foundation Funds
- Choices Funds: Snap and Temporary Assistance for Needy Families (TANF)



# Department of Education AtB Reporting Codes



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01 = ATB-Test Completed-1st Enrolled Before 7/1/12

02 = ATB-College Credits-1st Enrolled Before 7/1/12

04 = Home Schooled 06 = High School Diploma

07 = GED or State Auth. H.S. Equivalent Certificate

09 = Academic Transcript of 2-yr Program Acceptable for Full Credit Transfer to a BA Program

10 = Program Leads to at least an Assoc. Degree, Excelled in H.S. and met the Admissions Requirements

11 = ATB-Test Completed- 1st Enrolled 7/1/12 to 6/30/15

12 = ATB-Test Completed- 1st Enrolled 7/1/15 or After

13 = ATB-College Credits-1st Enrolled 7/1/12 to 6/30/15

14 = ATB-College Credits-1st Enrolled 7/1/15 or After

Note: The '02' value should only be submitted for students who qualify for Title IV aid under the alternate ATB provisions and not for any student meeting the standard eligibility provision. It should not be used for graduate students.

Note: For graduate or professional programs where a high school diploma or its equivalent is not necessary for admission to the program, and the student has a bachelor's degree, submit '09'.



# **Audit Finding Fears are Mythical!**



## Key Takeaways:

1. Partnerships are required to create the federal career pathway components
1. Roles and functions are critical to operationalize an accelerated AtB learning model
1. Adult education student integration is integral to acclimate students to college systems prior to entering the AtB pathway to increase student success



# Who's Benefiting from AtB

## Student Benefits (Equity)

- Access to FAFSA
- Transition to College
- Access to Accelerated Career Pathways
- Access to Wrap Around Services
- Access to Career Navigators
- Access to Support Instructors

## College Benefits

- Increased Student Success
  - Enrollments
  - Persistence
  - Retention
  - Completions Rates
- Meaningful Partnerships with Adult Ed and Community Partners

## Adult Education Providers

- Increased Student Success
  - Enrollments
  - Persistence
  - Retention
  - Completions Rates
- Performance-based Funding Measures
- Better Alignment w/Community College Systems



**Judy Mortrude**  
Special Guest, Senior Technical  
Advisor, World Education, Inc

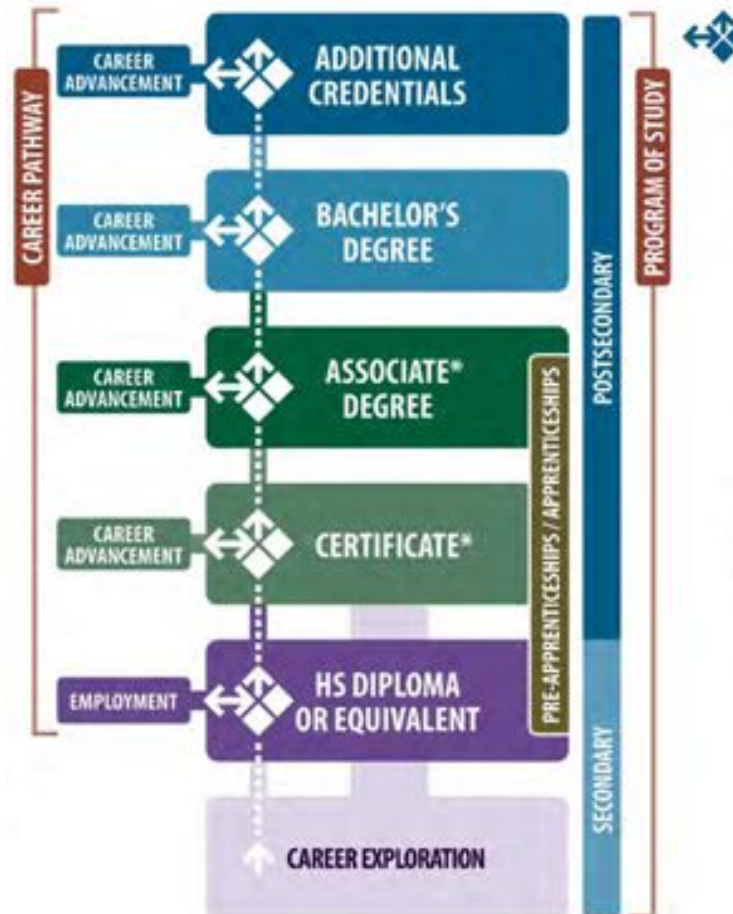
## What are ATB Pathways? And who decides?





# Pathways to Career Readiness and Advancement

*Programs of Study and Career Pathways share many of the same attributes. The two terms are used interchangeably in many state and local applications. Both are defined in Federal Law.*



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



# An Eligible Career Pathway:

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... is a combination of rigorous and high quality education, training, and other services that –

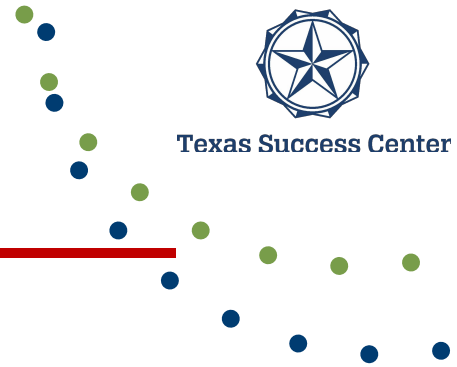
- A. Aligns with the skill needs of industries in the economy of the state or regional economy involved;
- B. Prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeship;
- C. Includes counseling to support an individual in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

Shared definition  
across 3 federal  
education laws:

HEA  
WIOA  
Perkins V

# An Eligible Career Pathway:

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- 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:

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- 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

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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:

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- 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

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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/careerpathways-checklist.pdf>



# Eligible Career Pathway Program

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# § 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.



## **Activity Three:** **Building the Texas Toolkit:**

**Part 1: Integrating Adult Education in Community College Systems**

**Part 2: AtB Tool Purpose Time & Introductions on how to navigate through the AtB Tool**





**Dr. Russell Lowery-Hart**  
President, Amarillo College

# **Developing Your Why:** **Integrating Adult Education in Community College Systems**





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# Integrating Adult Education

- AC Mission & Strategic Plan
- Educational Attainment
- Generational Poverty
- Love X Learning

# Integrating Adult Education



## 2022/2023 Impact Goals

### Impact Students

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**Change lives** through  
transformational  
opportunities

### Impact College

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**Generate revenue**  
200 Students  
\$6500/Student  
= \$1.3 Million

### Impact Community

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**Increase local  
gross domestic product**  
by  
upskilling workers



**Dr. Tamara Clunis**  
Vice President Academic Affairs,  
Amarillo College



# **Implementing Your Why:**

## **Integrating Adult Education in Community College Systems**





# Adult Education Integration

- College-Wide Communication
- Committee Involvement
- Institutional Research
- Institutional Effectiveness
- Accreditation

# Adult Education Data Integration



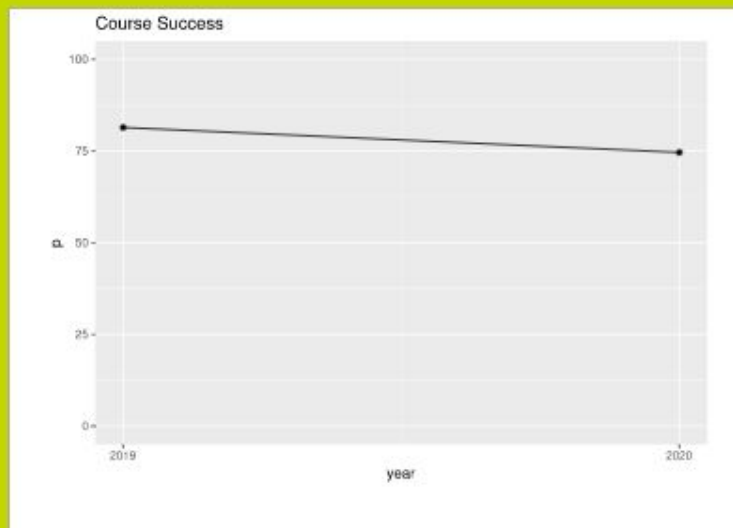
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## Strategic Plan 2025



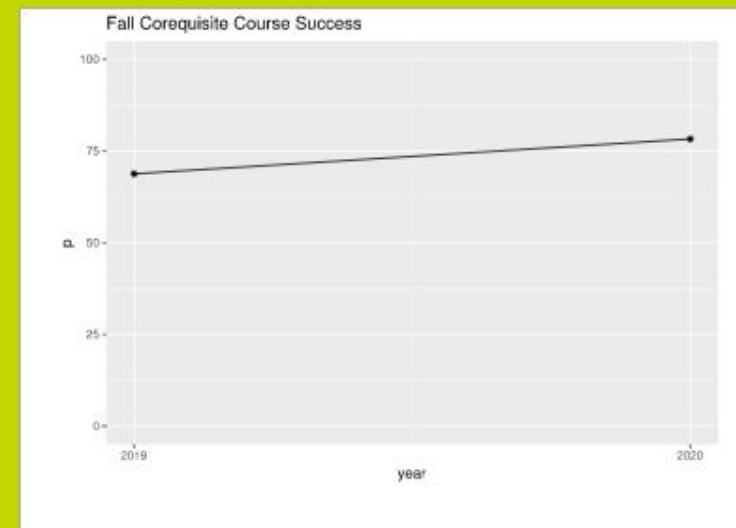
This dashboard allows users to see the measures related to the 2025 strategic plan.

## Career Ready You



This dashboard allows users to see measures related to students in the Career Ready You program such as course success, retention, and graduates based on an overall view or disaggregated by a predefined set of demographics.

## Corequisite Dashboard



This dashboard allows users to see measures related to corequisite students such as course success, retention, graduate, and transfers.



# Fast Lane

## Career Accelerators

Industry Certificates  
Portable Micro-Credentials

**REMEMBER TO BUCKLE UP!**



# Legacy Lane

## Traditional Degree Programs

**PLEASE DRIVE SLOWLY**





# Professional Learning

- Professional Learning for All!
- You foster a professional learning culture by focusing on your own professional learning
- Is it required?
- How do you hold people accountable?
- What resources do you make available?





## Activity Three: Part 2

# Introduction to and Purpose of the AtB Tool





# Introduction to & Purpose of the AtB Tool:

## Tackling the Seven Efforts

1. Provide Current Practices from Austin & Amarillo College
2. Collect Additional Research
  - a. Learn
  - b. Gather
  - c. Synthesize
3. ATB Tool has Seven Efforts
  - a. Facilitator Led
  - b. Share Questions Within the AtB Tool and Record Responses



# Thank You!



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**Deon Hope**

[drhope@actx.edu](mailto:drhope@actx.edu)



# Dear Colleague Letters: GEN-15-09 & GEN-16-09

GEN-15-09- Summary: This letter clarifies changes made by the Consolidated and Further Continuing Appropriations Act of 2015 to the Title IV eligibility of students who are not high school graduates.

(GEN-16-09) Subject: Changes to Title IV Eligibility for Students Without a Valid High School Diploma Who Are Enrolled in Eligible Career Pathway Programs | Knowledge Center



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# More Information:

**Financial Aid Eligibility Criteria:** [Eligibility Requirements | Federal Student Aid](#)

**AtB State Approved Test:** [Federal Register :: List of Approved “Ability-to-Benefit” \(ATB\) Tests and Passing Scores](#)

**AtB Resource Page:** [Ability to Benefit Resource Page - NCTN](#)

**Department of Education AtB Analysis:**

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

**2022/2023 Student Aid Handbook:** [School-Determined Requirements | 2022-2023 Federal Student Aid Handbook](#)



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# More Information:

## **2023/2024 Common Origination and Disbursement AtB Reporting Codes:**

<https://fsapartners.ed.gov/sites/default/files/2022-10/2324CODTechRefVol1.pdf>

**WIOA Title II Funding:** [Fact Sheet: What is WIOA Title II and Who Does it Serve? - National Immigration Forum](#)

**Carl Perkins Grant:** <https://cte.ed.gov/legislation/perkins-v>

## **Career Pathways Checklist:**

<https://lincs.ed.gov/publications/topic/wioa/careerpathways-checklist.pdf>

## **Issue Paper 1: Ability to Benefit:**

<https://www2.ed.gov/policy/highered/reg/hearulemaking/2021/isspapatbrev1.pdf>



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# Digital Tech Tools

**Google Site:** [What can you do with Sites? - Google Workspace Learning Center](#)

**Google Forms:** [Online Form Builder for Business | Google Workspace](#)

**Mentimeter:** <https://www.mentimeter.com/>

**Bitly:** <https://bitly.com/>



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