



Ability To Benefit (AtB) for Adult Education Students in Texas

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Ability To Benefit (AtB) for **Adult Education Students in Texas**

Introduction

Community colleges in Texas are at the forefront of constructing meaningful and systemic changes intent on providing educational attainment for Texans. In this article, I argue that changes in adult education and literacy (AEL) programs would be more efficiently addressed through an accelerated learning pathways model to increase enrollments in AEL programs that promote career pathways. The goals of obtaining a middle-skilled job and sustaining family wages continue to be the driving forces behind workforce, governmental, and educational initiatives. In a recent Coalition on Adult Basic Education (COABE) Journal Career Pathways Edition, a contributing author noted:

Taken together, the guided pathways approach, WIOA, and Ability to Benefit [formatted for emphasis] have created a unique and timely opportunity for adult education providers to meet workforce needs by connecting a diverse student population to the postsecondary credentials needed to secure living wage work in high demand industries (Durden, 2019, p. 117).

The purpose of this paper is to highlight considerations for community colleges to bolster efforts toward creating and implementing Ability to Benefit (AtB) models to increase eligibility for students entering accelerated learning pathways to careers. These models require structural consideration and strong internal and external partnerships between community colleges and adult education programs. Implementing and utilizing AtB models to enhance community college systems creates systems of equity. Community college systems partner with AEL programs to create pathways built to support students and thereby increase retention, persistence, and completion rates for students, AEL programs, and community colleges.

Equity

Equity is the trending word in higher education and many other organizations. No, this does not refer to home equity nor financial equity, but rather a powerful and well-defined educational principle. As described by Achieving the Dream (ATD):

Equity—our core founding principle—is the driving force to achieve the educational, economic, and social benefits of higher education for the students we serve. We believe that when colleges intentionally design and implement anti-racist and just structures, policies, and practices that combat oppression, students and their communities thrive. Higher education must interrogate the disconnect between institutionalized practices that impact student success and the systemic structures and processes that continue to oppress and exclude students based on the intersection of race, ethnicity, gender identity, language, (dis)ability, sexual orientation, economic status, and/or religion.

Achieving the Dream remains steadfast in our commitment to delivering studentcentered strategies to guide and support colleges to disrupt and dismantle historical, systemic discriminatory legacies, structures, and barriers that prevent community members from prospering. We expect ATD Network colleges to honor their institutional responsibilities to create and invest in thriving local communities by leveraging their leadership positions to actualize social, economic, and racial justice. Through bold actions, colleges must transform their practices to target and eliminate specific barriers to student success and address their students' needs by centering equity within their local context. (ATD, 2022)

Consequently, Texas community colleges are exploring AtB as an equitable career pathway model in higher education. The philosophy of AtB has been gaining traction since the 2015 iteration by adopting the Workforce Innovation and Opportunity Act (WIOA) career pathway definition. The AtB provision provides colleges with intentional enrollment models with student-centered strategies based on the career pathways component. To assign value and understand AtB, let's quickly establish the brass tacks. AtB models create access to federal PELL grants for marginalized people. Students without a high school diploma or its equivalent are not eligible for student aid, and AtB provides a provision to access the Free Application for Federal Student Aid (FAFSA) through "enrolling in an eligible career pathway program and meeting one of the 'ability-tobenefit' alternatives," according to studentaid.gov. The AtB pathway provides access to the amenity that would otherwise restrain marginalized students. AtB is unique, and some 1980's babies might use the vernacular "dope" when describing AtB—simply doing something cool. The "dopeness" of an AEL program and college system using AtB to support equity for educational attainment bypasses the high school (HS) diploma requirement; in essence, allowing a student without a high school equivalency (HSE) to take college-level courses while working toward a GED credential and simultaneously working toward a workforce-training degree.

Before we take a deeper dive, let us establish that AtB is a provision in which students gain access to federal aid but is not federal aid itself. As a practitioner, I have heard my colleagues and myself utilize the term "AtB" as if it is a type of federal aid. During my time as a Community College Research Fellow, I discovered that AtB is a pathway by which federal funding becomes accessible. Developed by the U.S. Department of Education (DOE) to offer guidance on requirements for using federal funds to support educational attainment, this idea of a pathway can be further supported:

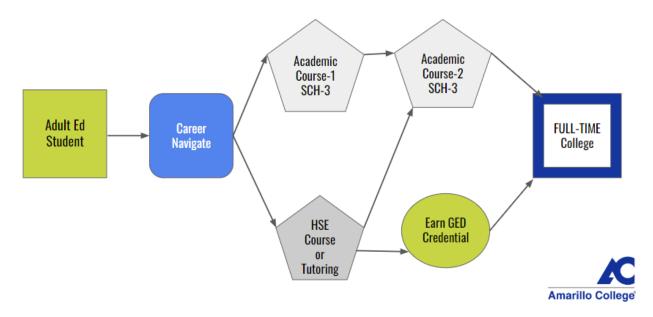
...given recent inquiries about the AtB alternatives under section 484(d) of the Higher Education Act of 1965, as amended (HEA). Section 484(d) allows a student who does not have a high school diploma (or its recognized equivalent), or who did not complete a secondary school education in a homeschool setting, to be eligible for Title IV, HEA student assistance (Title IV aid) through one of the AtB alternatives, but only if the student is enrolled in an eligible career pathway program (Office of the Postsecondary Education, 2021).

Creating Partnerships

Reviewing the DOE's AtB provision points out that there are two core elements when implementing an AtB model following the current <u>FAFSA eligibility</u> criteria for Title IV funds. The DOE's two-process guidance, specific to AtB, denotes the following criteria for utilization of AtB: (1) enrolling in an eligible career pathway program, and (2) meeting one of the "ability-to-benefit" alternatives. This clear guidance from the DOE can be utilized to facilitate the AEL and higher education institution partnership centered around developing a solid <u>CAREER PATHWAY</u> process per federal guidance (Figure 1). In addition, the newly-enacted WIOA of 2014 includes an updated definition and overarching framework for the implementation of career pathways at federal, state. local, and tribal levels (see Career Pathway Joint Letter).

Figure 1. Simultaneous Pathways Available With AtB

Why AtB?....Because it's DOPE, Simultaneous Pathways



Reader, let us be inquisitive for one moment before we move on. Think back to a well-developed partnership you have been a part of recently. The following are guiding questions for your reflection:

> Was the partnership successful? Did the partnership achieve the desired outcomes?

Responses to these guiding questions are key to measuring the quality of partnerships. The data that are collected are crucial to understanding the impact of the partnerships on students, programs, institutions, and communities. Creating well-developed partnerships increases success. Additionally, utilizing the framework of the WIOA Career Pathway Joint Letter, an aligned partnership can be established by first assigning responsibility for each of the seven career pathway components (Figure 2). Next, selecting the AtB alternative that best fits federal, state, local, and tribal level resources will create an intentional and meaningful partnership to operationalize AtB based on the federal statute.

Figure 2. Seven Components of an Eligible Career Pathway Program

<u>Definition of an Eligible Career Pathway Program</u>

Public Law 114-113 amended the definition of an eligible career pathway program for purposes of Title IV eligibility under section 484(d)(2) of the HEA to align with the definition of career pathway in section 3 of the Workforce Innovation and Opportunity Act (WIOA) (29 U.S.C. 3102(7)). Under section 484(d)(2) of the HEA, an eligible career pathway program means a program that combines 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 apprenticeships registered under the Act of August 16, 1937 (commonly known as the 'National Apprenticeships Act'; 50 Stat.664, chapter 663; 29 U.S.C. 50 et seg.);
- 3. Includes counseling to support an individual in achieving the individual's education and career goals;
- 4. Includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational 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 high school diploma or its recognized equivalent, and at least one recognized postsecondary credential; and
- 7. Helps an individual enter or advance within a specific occupation or occupational cluster.

In the next section, the roles and responsibilities of the seven components of the eligible career pathway program are highlighted and discussed.

COMPONENT 1: Aligns with the skill needs of industries in the economy of the state or regional economy involved.

In Texas, local workforce boards list the target and in-demand occupations with labor market information forecasting data to ensure alignment with Component 1. This eliminates guessing whether a program meets Component 1—the state provides straightforward, usable, and intentional data to implement programs that meet state and regional economic needs. Check out the robust Panhandle Workforce Development Area as an example. Local workforce boards have the necessary pulse on labor market information to keep communities informed and connected with careers.

COMPONENT 2: Prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeships registered under the Act of August 16, 1937 (commonly known as the National Apprenticeship Act;.

Community colleges in conjunction with AEL programs can be assigned to collaborate to ensure programs meet the requirements of Component 2. In addition to certificate and degree programs, colleges are currently creating meaningful earn-and-learn apprenticeship programs. Students can earn knowledge, earn wages, or utilize prior knowledge in apprenticeship models.

COMPONENT 3: Includes counseling to support an individual in achieving the individual's education and career goals.

AEL program Career Navigation teams are trained professionals who provide guiding practices for students to select educational plans and career services based on career assessments (e.g., see Amarillo College's MyPlan). Additionally, Career Navigators assist with helping students identify barriers that could prevent students from staying on the path. Connecting students to resources and systems aligns with academic counseling to support students in achieving their education and career goals. To access information on Career Navigator training, read the National College Transition Network Career Navigator Training Manual.

COMPONENT 4: Includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster.

WIOA-funded AEL programs are well equipped to implement workforce preparation activities as prescribed by the <u>AEL Letter 04-17</u>. Integrated basic education and skills training (I-BEST) instructional teams can be trained and are suited to provide students with Workforce Preparation Activities, or services designed to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills. This includes competencies in the following:

- using resources;
- using information;
- working with others;
- understanding systems;

- skills necessary for successful transition into and completion of postsecondary education, training, or employment; and
- other employability skills that increase an individual's preparation for the workforce" (see AEL Letter 04-17).

COMPONENT 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.

Education, training, and related services are also considerations required for the development of career pathway programs. As things move swiftly and paradigm shifts are the norm in education. we are called to take notice of Executive Director of the New Jersey Higher Education Student Assistance Authority David Socolow's call to action on February 1, 2022, appealing to the U.S. Department of Education:

The Department's regulations should honor the intent of the post-2014 definition of AtB by promoting contextualized and coordinated WIOA title II and title IV coursework within an IET, rather than standalone components of title IV programs and separate literacy and numeracy education. The Department's approval of eligible career pathways for AtB title IV eligibility should enable adults to gain basic skills through career pathway-aligned methods connected to their career training by embedding WIOA title II literacy and numeracy instruction into the occupational skills taught by a title IV training component of an IET program. Making these robust IET programs a requirement for AtB will help many low-income adult students without a high school diploma or its equivalent receive Pell Grants to support effective training that will boost their career prospects.

This memorandum highlights having a synergistic and valuable partnership between community colleges and AEL providers to increase accelerated-learning frameworks. Institutions of higher education and AEL programs should include I-BEST instructional staff to support students' successful completion of the first six credit hour courses. I-BEST instructors can develop contextualized basic education curricula and support students through holistic wrap-around services increasing persistence, retention, and ultimately completion. All practices are allowable provisions with Adult Education and Family Literacy Act (AEFLA) funds. This process will create thriving accelerated career pathways in tandem with eligible AtB career pathways. AEFLA funding, according to the Code of Federal Regulations, "assists adults in attaining a secondary school diploma or its recognized equivalent and in the transition to postsecondary education and training, through career pathways." Institutions of higher education partnering with AEL programs can increase educational attainment to a middle-skilled career. The U.S. Department of Education's federal definitions for <u>career pathways</u> utilized by community college systems specific to AtB have a clear alignment to Texas Workforce Commission (TWC) adult education's <u>AEL Letter</u> 2-16; Change 1; this adoption creates a more seamless partnership between AEL programs and colleges.

COMPONENT 6: Enables an individual to attain a high school diploma or its recognized equivalent, and at least one recognized postsecondary credential.

AEL programs have four primary core functions, and one of those functions addresses earning a high school equivalency. As such, AEL providers have the expertise to address Component 6 and additional core functions.

Adult Education programs "funded by the Texas Workforce Commission (TWC) provide English language, math, reading, and writing instruction to help students acquire the skills needed to succeed in the workforce, earn a high school equivalency, or enter college or career training" (see TWC, 2022).

COMPONENT 7: Helps an individual enter or advance within a specific occupation or occupational cluster.

Community college systems in Texas are implementing guided pathways through the Texas Pathways strategy, Pillar 1 of the strategy, Mapping Pathways to Student End Goals, explains how alignment of workforce training degree programs is essential to accelerating learning pathways:

Essential Practice 1A Developing Well-Designed Programs - To develop pathways to completion and further education and employment in fields of importance to the region, Texas Pathways colleges: (a) established meta-majors, (b) developed program mapping processes, (c) ensured university alignment, and (d) ensured workforce programs delivered employment skills for in-demand jobs (see <u>Texas Success Center SOAA Report 2019</u>, p. 4).

With clear roles and responsibilities established for AEL programs and community college partners, the career pathway component may be developed by experts in both fields.

Selecting Appropriate AtB Alternatives

The DOE outlines three options for AtB eligibility. The options below allow programs to increase equity by providing multiple on-ramps to college programming:

- Pass an independently administered, DOE-approved AtB test.
- Complete at least six credit hours or the equivalent coursework (225 clock hours) that are applicable toward a degree or certificate offered by the postsecondary institution.
- Participate in a state process approved by the Department (see DOE, p. 1).

Reader, which alternative is the best fit for your institution? The <u>DOE Office</u> of Postsecondary Education released an *Analysis of Ability to Benefit Usage* on March 14, 2022. This analysis was done over the span of 2016–2021 and shares recent data points surrounding the use and appropriation of PELL awards (Figure 3):

- Ability to Benefits Enrollment and Disbursements, By Award Year (AY)
- Ability to Benefit Enrollment and Disbursements, By Award Year and Control
- Public, Private for-profit, or Private non-profit organization
- Ability to Benefit Alternative Eligibility: either by earning at least six college credits or by passing an approved exam
- 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

The AtB data recounts an intriguing story. Private for-profit institutions have maintained stable enrollment growth utilizing the state-approved AtB exam. For-profit institutions historically have higher tuition rates. This may be the driving force for preferring the AtB exam alternative. For a list of state-approved AtB exams, access <u>here</u>.

On the other hand, enrollment and distribution of federal student aid have been on the decline for both public and private non-profit institutions from 2016 to 2021. Moreover, findings depict that in states with public and private non-profit institutions, students were earning six college credits to access federal Pell grants, which is the more expensive implementation alternative. This is based on the upfront cost associated with the first six semester college hours that have to be paid by either the student, AEL program, community college, workforce solution partner, or other developed funding source.

Across the U.S., AEL programs and community colleges are working together to operationalize AtB alternatives. The Washington State Board for Community and Technical Colleges' Basic Education for Adults college systems constructed one of the first state-approved AtB alternatives; joining in the ranks are Mississippi and Wisconsin. As the utilization of these state-approved alternatives begins its journey, data will follow. The great news about these state-approved processes is their potential to create a no-cost or low-cost AtB model. Optimistically, the pathfinders Washington, Mississippi, and Wisconsin will lead the way as Texas appeals to the DOE for the Texas state-approved AtB process.

The data in Table 1 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 vet 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 2023, one in four used the exam.

Table 1. Federal AtB Data (DOE, 2022)

	ATB Student by Earning At Least 6 Credits		ATB Student by Test	
Award Year	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

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 (Figure 3).

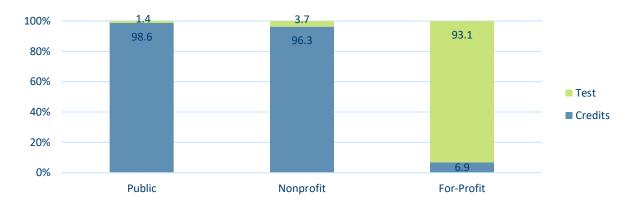


Figure 3. AtB Enrollment Pathway, By Control, for AY 2021 (DOE, 2022)

Furthermore, as we shift focus to a state-wide level, there are some Texas AEL programs and community colleges that have moved the needle along the educational-excellence continuum. However, the data show Texas is significantly underutilizing AtB. Texas has over 250 total college systems that could access AtB, and the data show 79 institutions utilizing AtB in 2021 (Table 2).

Table 2. AY 2021 Ability to Benefit Enrollment and Disbursements, by State (DOE, 2022)

	Total		
State	Enrollment	\$ Disbursed	# 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
СТ	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	\$806,324	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

To understand the use of AtB in Texas community colleges, I conducted several interviews with AEL professionals. Interviews with Austin Community College, Paris Junior College, Laredo Community College, Houston Community College, and Amarillo College revealed a recurring theme to develop a functional and systemic AtB model program. The key stakeholders interviewed were college leaders, a financial aid director, an AEL director, Career Navigators, college registrar office staff, college information technology staff, I-BEST instructors, workforce boards, and TWC staff. Subjects were asked what role-specific support efforts were taken to create a sustainable, stackable, and scalable AtB career pathway program. Table 3 provides key takeaways about the role of college and AEL staff in supporting AtB for students.

Table 3 Findings from Interviews with AFI Professionals

College Staff	AEL Staff
 Role: College Leadership – Chief Executive Officer (CEO), Provost, Vice President, Chief Financial Officer (CFO) Function: ➤ Champion system changes to operationalize AtB ➤ Facilitate systemic college buy-in through communication planning 	Role: TWC Function: ➤ Mapping pathways to student & grant end goals ○ Provide guidance related to funding codes in TEAMS to track AtB students ○ Provide additional guidance on special initiative grants associated with AtB
 Role: Financial Aid Director Function: Facilitate information on federal aid as it relates to AtB Check and confirm AtB eligibility has been met and award PELL Create audit proof process in tandem with AEL providers 	Role: AEL Director Function: ➤ Mapping pathways to student & grant end goals ○ Develop a meaningful partnership with workforce leaders to identify career pathways from the in-demand or targeted occupation list ○ Create audit-proof process in tandem with community college financial aid office ○ Oversite to create and maintain strong integration between community college and AEL providers ➤ Operationalize AtB pathways

College Staff	AEL Staff
Role: Registrar Office Function: ➤ Create program designations for AEL programs to track AEL entry points; example could be an Adult Basic Education (ABE) designation for English as a Second Language (ESL)/General Education Development (GED) students on the enrollment application	Role: Career Navigator Function: ➤ Ensuring career pathways are short-term stackable credentials ➤ Helping students choose and enter paths ➤ Creating identification process for AtB students ➤ Keeping students on their paths ○ Remove student barriers ○ Retention experts ○ Completion experts
Role: Information Technology Function: ➤ Create a system to create student IDs for GED/ESL students for point of entry identification purposes ➤ Create data systems to run reports over AtB data, collect AtB data, and customer relation management (CRM), if applicable	Role: Data Specialist Function: ➤ Enter AtB data into TEAMS ➤ Verify & enter Workforce Measurable Skills Gain (MSG) ○ Type 3 - Postsecondary transcript or report card ○ Type 4 - Progress milestone ○ Type 5 - Skills progression
	Role: I-BEST Instructional Team Function: ➤ Ensuring students are learning ○ Following AEL Letter 01-18, Change 1; providing AEL activities and workforce preparation activities; examples create contextualized curriculum and digital literacy ➤ Keeping students on the path ○ Increasing persistence ○ Increasing retention ○ Increasing completion rates

AEL directors and Career Navigators gave additional insights that provide frameworks for validating the benefits that leveraging AtB programs bring to support educational excellence. An AEL director stated:

"AtB is a practical college entry point providing transformational opportunities in career upskilling, reskilling, or new skilling into springboard careers. Students have access to support services that increase the four traditional college performance metrics. These four metrics align with TWC AEL metrics: enrollment, persistence, retention, and completion. Utilizing AEL's financial and instructional resources to fund the six-credit hours and create contextualized ABE curriculum promotes sustainability and scalability. Utilizing a well-developed I-BEST model according to the 2012 Community College Virtual Symposium Briefing, 'Findings suggested that being enrolled in a college that offered I-BEST increased the likelihood that basic skills students would earn college credit and receive an occupational certificate within three years.' (DOE; p. 14). I-BEST instruction is a tremendous asset to the AtB career pathway model. Funding for the I-BEST instructors can be provided by the title II Adult Education grantee. Additionally, traditional academic students in the course can receive the I-BEST supports according to the AEL Letter 06-15, Change 1.

Deliberative internal and external collaboration when making decisions is essential. Training AEL data specialists is necessary for data reporting in the TWC's data management system, Texas Educating Adult Management System (TEAMS). Working with the information technology team to capture key elements in the college's student information management system (SIMS) (e.g., Colleague, Banner), is a principal way to measure success through data tracking for the TWC AEL grant's <u>contracted performance-based measures</u> and the college's enrollment, persistence, retention, and completion metrics."

Reflecting on the Texas Peer Mentor Network (TX-PMN) Project, one Career Navigator stated:

"During the TX-PMN partnership, Amarillo College constructed a career navigator-to-student success ratio. Every 50 students may require one Career Navigator specifically for AtB pathways because of the importance of holistic advising. Utilizing AEL resources to mitigate or remove student barriers is essential. The ratio may seem too low; however, if you look through an investment lens by completing a return-on-investment evaluation, you will guickly see a substantial ROI.

Moreover, the importance of student support and integration into the college is critical. Students must have full access to college resources such as tutoring, instructional support, and college wrap-around services before they enter college. Access should be provided while only attending GED or ESL classes. Access prior to college enrollment will expose students to college systems, preparing them for success. An example of full college wrap-around services would be the 2021 Aspen Institute Rising Star Amarillo College's Advocacy and Resource Center (ARC).

Is there anything transformational about providing adult education student support once they have matriculated to an academic student? Community colleges will take transformation to a different level when we provide access to college systems and support to ESL or GED students prior to academic enrollment. This is the power and edge of college integration of adult education programs."

Further Considerations: Strategic Plans

Aligning policy and practice by analyzing strategic plans can further optimize AtB models between AEL and community college systems to promote efficiency and efficacy during the AtB pathway implementation process. Let us evaluate a crosswalk between Amarillo College's strategic plan and the TWC AEL Strategic plan (Figure 4). Note the similarities in terminology as they reflect career pathways, partnerships, labor market, learning, and financial effectiveness to align policy and practice while creating, implementing, and conducting effective AtB pathways (Table 4).

Figure 4. Amarillo College Impact Goals



Table 4. Crosswalk Between Amarillo College Goals and TWC AEL Strategic Plan

Amarillo College Strategic Plan 2025	TWC Adult Education and Literacy Strategic Plan 2021–2026
Align Degrees and Certificates with Labor Market Demand Action. Create Economic Diversification in Texas Panhandle	Goal 1: Increase Outcomes Workforce, secondary, and postsecondary education and training outcomes to support increases in education and work-related outcomes through enhanced delivery and service integration
Learning Action: Infuse and Scale High-Impact Practices	Goal 2: Address Demand with Increased Access Address demand for AEL services in Texas by implementing strategies that increase and streamline access for current and future students
Equity Action: Build Systems for Equity Gains	Goal 3: Enhance Customer Experience with Increased Coordination Enhance the workforce customer's experience through increased coordination and integration among state and local system stakeholders
Financial Effectiveness Action: Build Systems for Financial Viability and Fundraising	Goal 4: Improve Program Effectiveness Improve AEL program effectiveness, which includes program accountability and fiscal integrity, and provide tools to communicate the AEL program impact to AEL stakeholders

Other colleges planning to integrate AEL and AtB strategies may benefit from conducting a similar crosswalk to see how integration can support existing strategic plans.

Innovative Funding Options

Doubling back to the DOE's AtB analysis, who's footing the bill for the most common AtB alternative? Keeping equity at the forefront, we will need to consider funding options that create multiple funding streams or become innovative to reduce the cost of the first six credits for the AtB models is ideal. For instance, Houston Community College (HCC) has begun offering HCC students a 66% reduction for career pathway AtB courses. Also, Laredo College has a robust articulation process that allows students to begin continuing education pathways and articulate credit-bearing career pathways forward to the college side. These activities assist in reducing the cost of the AtB six-credit alternative. According to guidance from the U.S. Department of Labor, partnering with WIOA-funded AEL providers can provide funding for individualized career services and training services.

AtB Challenges

Based on feedback from community college staff and adult education providers, a consistent story was unveiled. Implementing an AtB program requires maximum joint efforts by the aforementioned stakeholders to systematize and successfully operationalize a cohesive and functional AtB model. Nevertheless, some recurring challenges were creating effective, hasslefree partnerships between institutions of higher learning and AEL, "fear" of audit findings, and the ability to scale by funding the six-credit hour alternative. The fear mentioned was connected to internal audit findings related to how AtB funding is applied, and this concept of fear was stated multiple times. The fear was centered around not having enough information to audit-proof an AtB pathway, mainly with regard to the release of financial aid awards and guidelines surrounding the career pathway identification process.

Some possible solutions to address the maximum joint efforts are centered on collaboration among departments, maximizing each department's expertise. In general, partnering mitigates errors. Also, reaching out to other institutions that have well-developed AtB processes will also minimize any unforeseen risk. Amarillo College's Vice President of Academic Affairs Dr. Tamara Clunis charges community colleges to "Fear Not" and move forward with innovative AtB pathways. If the goal is to increase educational attainment opportunities for marginalized populations, then the maximum joint effort will yield a return on investment for all involved students, AEL providers, and community colleges alike.

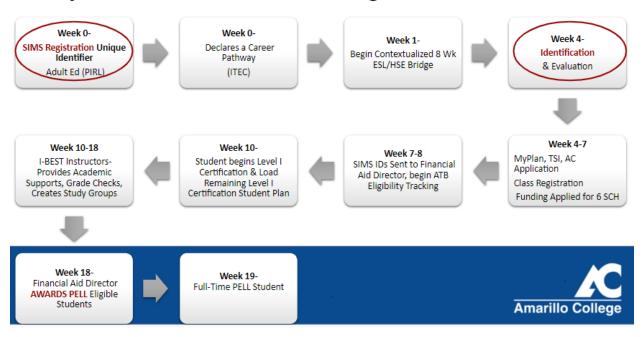
Conclusion

Intentional alignment of practices and policies can be the starting point. The information presented in this paper should be a resource for developing, designing, and evaluating the utilization of AtB strategically across systems. Based on a recent DOE data analysis, should we be concerned about the decline in AtB usage? Can effective partnerships bolster the usage of AtB models between community college and adult education providers? Texas, let us simultaneously increase GED and postsecondary educational credential attainments to move students into middle-skill jobs and access livable wages by creating equitable pathways utilizing AtB models for Texans.

Appendix A

Amarillo College's AtB Process

Ability To Benefit Process- Integration & Identification



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The Texas Success Center supports the Texas Association of Community Colleges members' efforts to improve student success and directs Talent Strong Texas Pathways—a statewide strategy focused on building capacity for community colleges to design and implement structured academic and career pathways at scale, for all students. For more information, visit tacc.org/tsc