ATB and Career Pathway Programs

How to Determine if Your ATB Program is Title IV Eligible
Agenda:

• Purpose of today’s presentation
• Introductions
• Ability-to-Benefit: Background and history
• Understanding the eligibility criteria
• The limits of ED Guidance
• Making the case for eligibility
• Q&A
Introductions: Chris Young, Wonderlic

Chris Young, Wonderlic
Chris is the Director of Research and Development Operations at Wonderlic where he also supports Wonderlic’s legal counsel on education compliance and regulatory affairs.

Chris has been managing the continuous improvement and standardization of Wonderlic’s ATB program since 2006. Representing test publishers, he served on the 2009-2010 Negotiated Rulemaking Committee, where he worked with the Committee to clarify, update, and improve the existing ATB regulations.
Deb Mills, The Mills Network
Deb is founder of The Mills Network, providing leadership in instructional design for Adult Career Pathways and the U.S. ED, and subject matter expertise for the U.S. Department of Labor and DOLETA/OCTAE.

Deb is the Director for the National Career Pathways Network and recently served as a lead subject matter expert for “The Career Pathways Toolkit: Six Key Elements for Success.”
The latest census data indicate that the overall HS graduation rate is over 80%, but that is not the case for every group...

Rates are improving, but that still leaves 300K – 500K students behind annually.

U.S. High School Averaged Freshman Graduation Rates (AFGR), Classes of 2006-2012

Source: U.S. Department of Education, National Center for Education Statistics, Common Core of Data (CCD), "NCES Common Core of Data State Dropout and Graduation Rate Data file," School Year 2011-12, Preliminary Version 1a; School Year 2010-11, Provisional 1a; School Year 2009-10, 1a; School Year 2008-09, 1a; School Year 2007-08, 1b.
ATB: Background and History

Non-High School grads are typically ineligible for Title IV Student Financial Aid.

ATB Testing is one of the keys to unlocking student access to Title IV funding.
So, what is Ability-to-Benefit testing?

ABILITY TO BENEFIT (ATB) - A federal student aid eligibility criteria for postsecondary students who:
(a) Do not have a high school diploma or its recognized equivalent and
(b) Are beyond the age of compulsory school attendance in the state where the institution is located.

To be eligible to receive federal student aid, the law requires these persons to show that they have the ability to benefit from postsecondary education. To demonstrate this they must pass an independently administered test approved by the US secretary of education.
ATB Testing Programs are comprised of three key elements:

1) Test Publisher
2) Independent Test Administrator (ITA)
3) Eligible Provider*

*3b) Student enrollment in a Career Pathways Program

..and as of 2015...
ATB: Background and History

Program Changes through the years...

- TODAY
- 2015
  - ATB Reinstated
- Program Integrity (2009-2012)
- The 90’s
- The Early Years (1965-1990)
  - Higher Education Act (HEA)
ATB: Background and History

Program Changes through the years...

The Early Years (1965-1990)

Higher Education Act (HEA)

- Originally limited to HS grads
- Introduced testing as threshold
- Testing administered by institution
ATB: Background and History

Program Changes through the years...

The 90’s

- Compliance issues
- Formal ATB program introduced
- First list of ATB tests: Federal Register (61 FR 55542-55543)

The Early Years (1965-1990)
Higher Education Act (HEA)
ATB: Background and History

Program Changes through the years...

Program Integrity (2009-2012)

- Additional compliance issues
- Concerns about quality of educational programs
- Same neg-reg as Gainful Employment
- Consensus, then disappearance
- Grassroots efforts for reinstatement

The Early Years (1965-1990)
Higher Education Act (HEA)

The 90's
ATB: Background and History

Program Changes through the years...

- 2015
  - ATB Reinstated

- Program Integrity (2009-2012)
- The 90's
- The Early Years (1965-1990)
  - Higher Education Act (HEA)

- ATB quietly reappears
- New requirements
ATB: Background and History

Revised Career Pathway Program definition (2015 changes):

• Public Law 114-113 (December, 2015) amended the definition of an eligible career pathway program for purposes of Title IV aid 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, in addition to meeting certain eligibility criteria.

• The Department of Education will not approve career pathways. However, if your institution is audited, you must be able to document that your program meets the eligibility requirements that have been established in the Ability-to-Benefit guidelines. See Dear Colleague Letter DCL ID: GEN-15-09.
Updated ED Guidance:

What are *your* challenges...

In addition to meeting the traditional ATB program requirements, schools also have to meet the new Career Pathways Program requirements... but you’re on your own
Understanding the eligibility criteria:

Career Pathways Program -- New definition with 7 criteria:

– Aligns with the skill needs of industries in the economy of the State or regional economy;
– Prepares an individual to be successful in secondary or postsecondary education options
– Academic and career goals counseling and supportive services;
– Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
– Organized to meet the particular needs of an individual in a manner that accelerates their educational and career advancement;
– Enables an individual to attain a high school diploma/recognized equivalent, and at least one recognized postsecondary credential; and
– Helps an individual enter or advance within a specific occupation or occupational cluster.
Updated ED Guidance:

Concurrent Enrollment in ABE and Postsecondary components

The August 1, 2016, DCL removed the requirement for completion of both components before earning a postsecondary credential, but still requires participation in BOTH components:

**Question 8:** Is each ATB student required to be concurrently enrolled in both a component that enables an individual to attain a high school diploma, or its recognized equivalent, and postsecondary coursework throughout the student's enrollment in an eligible career pathway program?

**Answer:** No... the eligible career pathway program must be designed in such a way that students participate in both the Title IV eligible postsecondary program component and the component that enables an individual to attain a high school diploma or its recognized equivalent. However, the attainment of a postsecondary credential is not contingent on obtaining a high school diploma or its recognized equivalent. Similarly, a student who has met the requirements of the secondary component of the eligible career pathway may be awarded a high school diploma or its recognized equivalent even without completing the full program.
Top 3 Challenges currently facing institutions:

✓ Each institution must make its own determination of whether a program is an eligible career pathway program based on the statutory definition in section 484(d)(2) of the HEA, and as described in Dear Colleague Letter GEN-16-09.

✓ An institution must maintain documentation that each of its eligible career pathway programs meet the requirements in the definition of an eligible career pathway program in section 484(d)(2) of the HEA and described in Dear Colleague Letter GEN-16-09.

✓ There is no requirement under the HEA that an eligible career pathway program be approved or endorsed by the Department or by an accrediting agency or a State. The Department will not be developing a career pathway program approval process, but will review the eligibility of these programs through program reviews and audits.
Making the case for eligibility:

• Does it sound too hard? Guess what? *We found a solution!*
Making the case for eligibility:

Wonderlic and The Mills Network Collaboration:

The Mills Network is an educational services company that is committed to enhancing educational policy, advancing innovative practice, and expanding access for youth and adults from K-12. The Mills Network has supported the U.S. ED, the U.S. Department of Labor, urban districts such as Chicago City Schools, global corporations, state secondary and postsecondary systems, and the private sector in:

• educational and workforce development systems
• program assessment
• strategic planning
• technical assistance
• capacity building

The Mills Network believes that education and workforce development must be seamlessly connected in order for there to be economic prosperity: “It is time to diverge and to build clearly articulated pathways systems that are richly diversified to align with the needs and interests of today’s young people and better designed to meet the needs of the 21st century economy.”
Making the case for eligibility:

The Mills Network Group Ability-to-Benefit Services:

✓ Step 1: Preliminary Review

✓ Step 2: Program Review - A comprehensive onsite program review to determine if your programs are eligible for Title IV aid.
Criteria Used in Ability-to-Benefit Program Review

- Public Law 114-113: Definition of eligible career pathway program for purposes of Title IV aid eligibility under section 484(d)(2) of the HEA to align with definition of career pathway in section 3 of the 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:
  - Aligns with the skill needs of industries in the economy of the State or regional economy involved;
  - 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’; 50 Stat. 664, chapter 663; 29 U.S.C. 50 et seq.);
  - Includes counseling to support an individual in achieving the individual’s education and career goals;
  - 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;
  - 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;
  - Enables an individual to attain a high school diploma or its recognized equivalent, and at least one recognized postsecondary credential; and
  - Helps an individual enter or advance within a specific occupation or occupational cluster.
Looking through this Lens:

• The Mills Network will look at the seven criteria through the lens of the *Six Key Elements of Career Pathways* (#1 below) and the *10 Components of Program of Study* (#2 below):

  • *Six Key Elements of Career Pathways*  
  https://careerpathways.workforcegps.org/resources/2016/10/20/10/11/Enhanced_Career_Pathways_Toolkit

  • *10 Components of Program of Study*:  
  https://s3.amazonaws.com/PCRN/docs/POSLocalImplementationTool-9-14-10.pdf
Making the case for eligibility:

The Mills Network Group Ability-to-Benefit Services:

✓ Step 1: Preliminary Review - The Mills Network will perform a Preliminary Review of the Institution’s documentation to determine if the Institution is ready for a formal Program Review of each Program.
Making the case for eligibility:

The Mills Network Group Ability-to-Benefit Services:

✓ Step 2: Program Review- A comprehensive onsite program review to determine if your programs are eligible for Title IV aid.

- For each Program passing the Preliminary Review, The Mills Network will perform an onsite Program Review of the Program(s).

- Following the onsite Program Review, The Mills Network will provide the Institution a Program Review Report for each Program. The Institution may provide this Program Review Report to the U.S. ED, and other entities, as validation that each such Program meets ED’s requirements of an “eligible career pathway program.”
We are sure you have lots of questions such as:

- How soon can we schedule a review?
- How long does a preliminary review or a comprehensive onsite review take?
- How is pricing determined?

The answers can vary depending on size of institution, enrollment, and the number of programs you wish to have reviewed.

For more information, contact:

ATBCareerPathways@wonderlic.com
So we’re eligible – What’s next?

- Wonderlic
  - Account setup
  - Training and Certification
  - Testing and Scoring
  - Support
For additional assistance and support from Wonderlic or The Mills Network, please email us at ATBCareerPathways@wonderlic.com