

# Ability to Benefit - Understanding New Processes, Resources, and Guidance-20250114\_185427-Meeting Recording

January 14, 2025, 6:01PM

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**Cheryl James** 1:52

Good afternoon, everyone. I'd like to welcome you to our meeting today. My name is Cheryl James. I'm the project director for the Dual Enrollment for Adult Learners Project or DEAL as we call it, and I work with the Manhattan Strategy Group, who will be managing this project.

Today, we're going to discuss

Ability to Benefit, and we will focus on understanding new processes, resources and the guidance on Ability to Benefit.

As you can see, DEAL is the abbreviation for our project, and this is our project logo. The project is maintained under contract with the Manhattan Strategy Group, with funding from the US Department of Education (ED), Office of Career, Technical and Adult Education. You will hear a lot of opinions expressed in this meeting today. Not all of them represent the views or are endorsed by the Department of Education, but we aim to provide you with as much factual and rich information as possible.

Our agenda today: We will look at DEAL itself, what it's all about. We'll provide some information on the Ability to Benefit, and on some of the recent changes that have taken place. What are the resources available on Ability to Benefit? We'll then move on to some questions and answers and have a brief discussion on the next steps for the project.

Our presenters: I am doing the opening presentation. As I said, I'm Cheryl James. I work with the Manhattan Strategy Group. We will then have Judy Mortrude, who's collaborating with us on this project with World Education, and then we will have representatives from the Education Department, from Aaron Washington, who's from the Office of Post-Secondary Education, and Erin Berg, who is from the Office of Career, Technical and Adult Education. They're also guiding this project on the ED side.

So just to give you a bit of information about the DEAL project, as I said, is funded by OCTAE. It aims to support the development of Ability to Benefit

alternative state processes and increase the overall usage of Ability to Benefit to support the Dual Enrollment of Adult Learners in post-secondary education. The project is led by my organization, MSG, in collaboration with World Education and RTI International.

We're interested in understanding who you are. Happy to have you. We would like to understand who the audience is made up of. We don't have a poll, but we're going to ask you to briefly state in the chat what type of organization you are from. It'll help us in terms of targeting our discussion and then in future analysis. Let us know, are you a WIOE Title II education, an adult education agency provider? A higher education institution that is also a WIOA Title II provider? A higher education institute that does not deliver Workforce Innovation and Opportunity Act Title 2 services? Or are you from a state adult education agency or a state higher education agency? And if you're from, none of these, just tell us 'Other' and indicate where you are from. We'll give you a minute or so to quickly write that in the chat.

Good. I'm seeing state higher education agencies, non-profits. Great. Great audience. - I can look at the audience and see that we have some targeted organizations and colleges. - We have a lot of people that we believe would benefit from this information. We are now going to proceed.

While we want you to pay attention, please continue to let us know where you're from of course.

I'm going to turn the meeting over to Erin who's going to tell you a bit more about ATB. She's an expert on this from the Department of Education, and so she's going to provide you with solid information on Ability to Benefit. Thank you.



**Berg, Erin** 6:47

And actually, I'm going to turn it over to Judy, I believe, who's going to cover these slides.



**Judy Mortrude** 6:52

I'll do the background.  
So just first--



**Berg, Erin** 6:54

Who is also an expert, by the way.



**Cheryl James** 6:55

Who is awesome.



**Judy Mortrude** 6:57

A little bit of background on ATB (Ability to Benefit). So, what is it? Simply, it is a rule in the Higher Education Act that allows students who do not yet have a high school diploma or equivalency to be eligible for federal student aid. That is Pell grants. That is work study. That is any federal student aid, if they are enrolled in an eligible career pathway program. It sounds easy. But it has been complicated. The next slide shows you a little bit of the history of ATB, even though it was initiated more than 30 years ago. As you can see on the slide, the timeline of ATB implementation has been full of ups and downs, including a temporary termination decision in 2012 by Congress. However, ATB was fully reinstated as of 2016.

It's now aligned with the career pathway definitions in WIOA, which governs federal adult education, and is the same definition we have in the Strengthening Career Technical Education for the 21st Century Act, which is Perkins V's Career Tech Ed and in the Higher Education Act specifically for ATB. Over the past decade, we've had a lot of momentum around ATB. It's really continued to grow, leading states to gain approval for their state-defined options. And, as you will hear about today, there are also new regulations, and the launch of this DEAL project.

So why is ATB important? Why have 250 of you joined us today? Essentially, ATB supports students who are completing that high school diploma or equivalency, while beginning their post-secondary pathway. ATB supports adults working toward college and credential completion. Most importantly, ATB allows students the opportunity to do all these things at the same time. So, ATB is this mechanism for breaking down sequential education and promoting simultaneous instruction, really promoting dual enrollment for adult learners across post-secondary education systems.

Eligibility. For a student to become an ATB student, the program they enroll in must be eligible and the students themselves must meet one of three eligibility requirements. Let's start with the second bullet on this slide: how to make a student eligible for ATB, and there are three methods. One is hitting a cut score on a U.S. Department of Ed approved ATB assessment. Another is having completed post-secondary credits or credit hours, 6 credits or 225 clock hours. A third is participating in a state-defined process that has been approved by the Department of Ed. This

requirement and these three options have been around for years and years. The first bullet is not about making the student eligible but about making the program that you're enrolling that student into eligible.

That really is about meeting the definition of the eligible career pathway program, a program that supports students in completing their high school diploma or equivalency and earning a post-secondary credential.

On this next slide, we're going to start getting into some dense language and some frequent acronyms as we get into the regulations. You'll see some familiar terms that are used in ATB specific ways, starting with the title on this slide: What's the difference between an ECC, ECPP and A CPP? An eligible career pathway program versus a career pathway program.

While the career pathway program requirement has been in ATB since it was restored in 2015 the new requirement includes a process for approving a career pathway program to become an eligible career pathway program for the purposes of Ability to Benefit. The language highlighted in green here on the slide tells you that ECPPs are programs that have been approved by the U. S. Department of Ed to be used for federal student aid via ATB.

The language highlighted in orange says that CPP's career pathway programs are the career pathway programs you all have developed that have not yet been approved by the US Department of Education for ATB. And the language highlighted in purple tells you that to move to an eligible career pathway program, an institution of higher education uploads some documentation into their federal student aid portal. You're going to hear and see more about that from the experts soon. In short. ECPP is an ATB-specific term that refers to a program that meets all the requirements set out by the Department of Ed. Each ATB-using institution must submit documentation on at least one of their programs for approval by the Department of Education, regardless of which method they use to make a student eligible for ATB. This is not specific to one of those three methods for making a student eligible. It is specific to ATB in general.

So, we have a lot of resources for you. You should be able to click on these links live in the presentation. Also know that these slides will be posted. On the top row are the latest guidance documents from the US Department of Education. Some are quite new, explaining the two changes that we're discussing in today's webinar, so you can refer to those. On the bottom row - on the left side, there is guidance on one of the ATB alternatives for a student to become eligible, which is by using tests

for use in ATB. On the bottom right you'll find a link to the career pathway checklist which again provides that federal career pathway definition.

Why implement a state process? Quick quiz. You remember the three ways to make a student eligible, right? Hit a cut score on a test, you can qualify for ATB. Get, earn the six credits or 225 clock hours you can qualify for ATB or immediately qualify for ATB by coming in under a state process.

So, any institution of higher education with HA Title 4 eligible programs, federal student aid eligible programs, can use the test option, or can use the credit hour option.

And then an institution of higher education that is part of a state process plan has a third option. Why have it? Well, it simply removes the test or credit hour barrier for a student. It gives an institution of higher education another option, and it does not limit that institution of higher education to only using the state plan, because the decision on which option to use is made at the institutional level for each student. Again, states that have a state process are essentially just opening a third option for students beyond the test and credit hour option. Also, I should say a state option does not mean that every institution of higher education in the state is part of that process. A state ATB plan must list the institutions that are part of that plan, and only those institutions have that option available.

On this next slide, you'll see the seven states that have applied and received permission to implement their state option. These are primarily states with strong adult education career pathway program initiatives. Like Washington's I-BEST program, Illinois's ICAPS program, and Mississippi's MIBEST program. And in these states, the public two-year college system submitted the plan on behalf of their community and technical colleges.

That's a lot of background, and now we're going to move to Aaron Washington, the real expert who's going to tell us more about state process applications.



**Washington, Aaron** 15:41

Oh, thank you for that wonderful introduction. My name is Aaron Washington. I've worked in the ATB space well, the ATB Title IV space, Title IV eligibility space, for many years now. Some of you may have noticed my name on the Ability to Benefit tests, Federal Register notice where we list approved tests that a student can take to

fulfill that alternative. I may also have emailed some of you in the ATB state process at Ed.gov mailbox and so if you're here with us and I've talked to you, welcome.

The ATB regulations have been around since 1994, and the current administration recently decided to amend the state process regulations by making some changes. What I'm going to go through is a very high-level overview and I encourage you to read the regulations. The code of Federal Regulations contains all the regulations related to federal student aid. And it's part 34 and it's section 668.156. So, that's where you'll find the state process regulations. You'll hear throughout the presentation that we released a "Dear Colleague" letter. The regulations are required to be in plain language, but the "Dear Colleague" letter expands on that plain language so that the regulations are more accessible and easier for the public to read.

I know a lot of you are experts and professionals and probably can go straight to the regulations, but if you wanted more of a plain language text then the "Dear Colleague" letter is there to supplement to the regulations.

The state process application consists of two components. One is the initial application and two is the subsequent application. Once you submit an initial application, if it's approved, that approval will last for two years and the subsequent application's approval will last up to five years. The department could choose to approve the applicant for less than five years, but it could be up to five years and then you would have to reapply again in perpetuity.

All the steps are outlined in our "Dear Colleague" letter, the DCL GEN 2408.

We always call our "Dear Colleague" letters, DCLs. There's a lot of acronyms in the application.

Materials should be sent to [atbstateprocess@ed.gov](mailto:atbstateprocess@ed.gov) and we do encourage you to submit a subsequent application. After two years, when submitting the subsequent application, we encourage you to submit well before the expiration of your initial approval. That will help ensure that that you can continue to accept students through the state process and that they can establish eligibility for Title IV in that process.

Some state processes have expired and it's important to note that if a student established, or enrolled in your school, prior to expiration of the state process, then that student can continue, their program at that institution.

However, if your state process does expire, no new students can be enrolled in that program, we can continue enrolling students in the program, but those students

would not be able to establish eligibility through the state process if the process is expired. It is also important to note, that even if your state process does expire, Judy alluded to this earlier, you still have the option of the test and or the six credits or 225 clock hours to enroll ATB students into a career pathway program.

So, for all the state process applications, both initial and subsequent, you have to list every school in the state that's going to participate in the state process. You don't have to list every single school in the state. The state can select, they can be as selective as they wish. Most of the state process applications that we've received to date contain community two-year, two-year public colleges.

It's not limited to that, but that's the history of the approvals thus far. You list the school that you would like to participate in in the state process. Any school not listed on the application cannot provide Title IV aid to a student enrolled even if the student goes through some sort of state process, the school must be listed on the application. And so, you'll also provide a brief overview of how participating institutions were selected. This should be two pages or less.

I know a lot of states that would like to provide a lot of information to the department. A lot of applications we receive are very robust.

I'm not saying that you must be limited in the information that you submit to us, but really make sure that you're, at least in the beginning of the application, providing us the information that is listed in the "Dear Colleague" letter, DCL GEN 24. You want to make sure that that important information is upfront if you're going to submit supplemental documentation that wasn't specifically requested by the department.

Then provide a brief overview of student eligibility criteria. This is not like Title IV, it's based on student eligibility like, U.S. citizenship or eligible non-citizens or their Social Security Number. It's generally how participating institutions establish eligibility for students. I think we said that it should be about one page or less. Then you'll provide a statement that asserts all the programs that the student enrolls in through the state process to fulfill the requirements of the eligible career pathway program that Erin Berg will discuss later in the presentation.

The initial application must also include a statement that not more than 33% of a participating institution's regular students withdrew from the institution during the institution's last completed award year. This calculation is outlined in the regulations. Remember I said it was at 34 CFR 668.156, so you can go there if you want to see what the actual calculation is. But don't worry. Schools will be familiar

with this calculation because it mirrors calculations that govern school eligibility in a different section of our regulation. Any school or any participating institution will have already encountered the withdrawal calculation at some point during their institution's eligibility process.

During the initial approval, there's also enrollment caps. Only during the initial approval for the first two years. After the initial application, once you submit your subsequent application and are hopefully approved, there will be no more caps. But, during the initial two years, no more than the greater of 25 students or 1% enrollment can be enrolled through the state process.

I keep noting this, but this is just about the state process. That's a cap on the state process. Let's say your school is a participating institution during your initial period and you're enrolling students. You can still enroll ATB students, through the test or the six credit hours or 225 clock hours.

And there's no cap for the other two alternatives. States also must provide a certified statement that they will monitor all participating institutions and, if necessary, require corrective action. You're monitoring to ensure that the schools are complying with what you've outlined in your own state process application. And finally, if the schools are not in compliance, then you must assert that you will terminate the school from the state process for non-compliance and that the state is making the determination that they're not compliant. Then one individual school will no longer be able to participate in the state process. All other schools can participate, as long as they're compliant.

After two years, the state should submit the subsequent application well before the expiration of the initial application and include any new schools on that application. For schools that were already a part of the initial application, you don't have to do this, it's only for any new schools that you want to list on the application. Maybe it's been so successful in your state, you'd like to expand this to more schools. You'll have to provide the withdrawal rate for any new school listed in the application. No more than 33% of the regularly enrolled students could have withdrawn from that participating institution for it to be able to participate in the state process.

You'll again certify that you'll monitor schools on an annual basis. You'll again provide a statement about terminating schools for non-compliance. Additionally, in the subsequent application, you'll provide a narrative of economic circumstances for the typical student that enrolls in the state process. That is a statutory requirement.



Something that the law requires. You can include a description of the successes or failures regarding overall educational attainment of participating students, and a description of things that you would like to improve going forward in your subsequent application. There's a requirement in the regulations that you'll have to provide numbers on certain demographics like race, gender, age and economic circumstances, educational attainment. If you cannot provide that information, you can include the rationale for why you can't provide the information in the application.

I think I only have a few more slides left. This is the success rate calculation. It must be included in the subsequent application.

The calculation has been around since 1994. The calculation is a comparison of the success rate of high school graduates and non-high school graduates admitted to the state process and enrolled in the same program. The administration decided to make updates to the pre-2024 success rate calculation to make some clarifications. We hope those clarifications are a lot more understandable to the community.

Each individual participating institution must use the data from the last complete award year for which information is available. The success rate is calculated for each participating institution. Not for the entire group of participating institutions. That should help with your state process going forward because not all your institutions will lose eligibility. It would just be the one participating institution that could potentially lose eligibility if they don't meet the terms of the success rate.

So in the subsequent application, each participating institution must demonstrate that students admitted under the process have a success rate, that is, that students that don't have a high school diploma or recognized equivalent have a success rate that is within 85% of the success rate of students that, that do have high school diplomas.

And so that's the success rate in a nutshell.

And just a few things before I turn over to Erin. In the statute, if the department doesn't respond to an application within six months, your state process is automatically approved. If you don't hear anything from the department, if you email the state process mailbox and you just don't hear anything at all, the state process will be automatically approved.

So you can just re-email the state process mailbox and say hey, it's been six months and we haven't heard anything. We just want to know how we start awarding Title 4A to students enrolled through the state process.

The department at some point in the future could release a Federal Register notice asking for more information on your state, on your state process. For those who have approved state processes. But that'll all be outlined in the Federal Register and the department reserves the right to terminate a state process if we determine or find out through an investigation that anything in the state process was inaccurate or violated the terms of the approval.

So, thank you for your time and I will turn it over to Erin.



**Berg, Erin** 29:10

Thanks. What Aaron said is very true of what we do here at the Department of Education. There were some questions in the chat I was trying to respond to quickly. We do monitor that inbox, and you will get confirmation saying we received it. The six-month situation that Aaron talked about is a sort of technicality I think.

If your application comes in and is reviewed and there is something that we need to have revised we will get it back to you. But that was just a, a bit of a technicality that he wanted you to know about.

But we're going to go ahead and have Judy tell us what a career pathway is. And then I'll pick up on the eligible career pathway approval process.



**Judy Mortrude** 29:56

Thanks Erin. This current discussion is for states that already have a state process, because this next part about the eligible career pathway program is a responsibility at the institutional level. And everyone is going to need to be aware of those changes.

At the beginning of the presentation, I talked about the difference between an ECPP and CPP, an eligible career pathway program and a career pathway program in the ATB-specific context, and now we're just going to look at the federal definition of, of a career pathway as it exists in, WIOA. We know that this is the same definition found in Perkins 5. The same definition found in the Higher Education Act, specifically for ATB. So important words here: A career pathway is a combination. Combination, not a sequence, but a combination of education, training and other services. Part A tells you that education and training is in the field with regional labor market demand. Part B tells you that education and training is not simply customized training, but it is an educational experience that prepares people for the next educational experience. Part C tells you that the program has academic and career

counseling. Part D, if you're in adult education, Part D is the definition of integrated education and training IET. It's education, training and workforce preparation. Part E tells you it's organized for acceleration. Again, not sequential remediation.

Not sequential- earn your high school diploma first and then come into my post-secondary program- but simultaneous concurrent enrollment. Part F tells you that the program has both secondary and post-secondary credentials within it, and Part G tells you it's not just for entry level occupations, but it's also there to help people continue to advance in their pathway. So now Erin's going to walk us through the requirements for getting your CPP to turn into an ECPP.



**Berg, Erin** 32:09

How do you wave that magic wand? Before I start, we're using these terms, CPP and ECPP and career pathway in this webinar. We're using the terms in the context of Ability to Benefit, and we know that a lot of you are using career pathways for other programs: Perkins, WIOA. And there's a question in the chat, is it automatically ATB-eligible?

And the answer is no, if you're meeting the definition for another program, you're well poised to document the program eligibility for use with ATB. But you would still have to go through this process.

This is one of the things that's new in the new regulations. Until July 1st, when the regulations went into effect, colleges had to retain documentation that their programs met that definition. And we did hear from a lot of financial aid staff that they weren't necessarily feeling like that was a low risk. They felt we could come in and say, well, your documentation's not good enough. And so now, we do have a process where you can show that you know how to document that your program meets the definition that Judy went through. This is how we do it.

The regulations only require one career pathway and then the college or institution of higher education will have to certify any other programs that you're putting ATB students into and giving them access to Title IV federal student aid. This is the approval process. It's high level and a lot of these terms are financial aid specific. If it doesn't make sense, review your E-App. If you don't know what an E-App is, it's something that you'll need to know to have these conversations with your financial aid staff. That's an important thing there.

Aim to have these conversations with your financial aid staff when you've got a program that you're ready to start using ATB with or if you're already doing ATB and you're worried about how you'd go through this process.

The institutions have to document that these meet the eligibility, the "Dear Colleague" letter has been linked before, the regulation is cited there, but ultimately it's those seven elements that Judy just walked through that the program. There must be a combination of those. The third column here is talking about whether you had one before July 1<sup>st</sup>, that you're already doing ATB for one of the Washington States, Wisconsin States. I know colleges in Texas and Arizona and Florida. A lot of states do have colleges that are doing this at the college level.

If you offered Ability to Benefit prior to July 1<sup>st</sup>, you'll now have to send documentation for those programs. If you're at a community or technical college or another institution of higher education, when you decide to do it for the first time, then you also do this. That's what we're talking about here for the updates to the E-App, which is the system that the financial aid officers use.

When they go in to do their E-App, which is used for several other purposes, and, if they're changing something else, or if they're going into it specifically to complete this process, it will ask them these two questions. They are worded based on prior information provided. We had that slide that Judy talked about where we had different ATB alternatives entered along the way. At one point it used to be just a test. We now know, because we just did this webinar, that it is the test, the six credits or a state process. And so, when you're working with financial aid staff or if you're a financial aid staff here on the line, they should answer yes. If you're going to do ATB, if you're going to do the test, the six credits, the state process, and ideally all of them. You'll select yes, and that's what gives you the opportunity to move on to the next screen.

Question two is 'do you admit and enroll students through an ECPP (eligible career pathway program)'? You should answer yes if you are doing a career pathway program that you want to become eligible for ATB. If you have other career pathway programs and you're not doing ATB with any of them, then you would answer no and hopefully go and make some of your programs ATB-eligible and come back and answer yes.

If you answer yes to one or both, there'll be the opportunity to upload and select what alternatives you're going to use, and then there'll be a follow-up. There are regional offices that have a team of school participation division staff that your

institution would be familiar with and they'll follow-up to review the documentation that is submitted and then to let the institution know when they're approved.

Most of the people here are adult educators and there are a lot of community and technical college staff here. So, when you are working as a team, because it is not just one person doing all of this, it's not just the, the welding program staff wanting to do an ATB program. You need to be working with whatever adult educators that you're going to be co-enrolling these students into activities with. You're going to be working with the financial aid officers and leadership at the institution. If you're at an adult school, you'll be partnering with some sort of post-secondary institution that is Title IV eligible and you're going to get together and get this documentation together. All these things that are required in the regulations were built off that definition of the career pathway. If you're doing WIOA, if you're doing Perkins, it's all the same now.

I'm going to point out that you're going to prepare a portfolio of how your program that you're submitting as your example of a career pathway program that is eligible for ATB. You'll get together and get it all into some documentation. We, the DEAL team, will be working on additional resources. I'll mention a couple of those at the end to help you with this, but in the meantime, these are the things that you'd have to get together. Again, how are you describing what Judy mentioned, there must be adult education and literacy activities described under that regulation. You could document, you could come up with two pages or less description of how that program offers at least one of those activities. Or if you have a Title II WIOA-funded application that describes how those things are offered as well, that could be uploaded as one of those things. And just remember that there are 'or's in all of these.

It doesn't have to be both, as indicated in the "Dear Colleague" letter. If you have something else that you think will suffice for this adult education, literacy activities, workforce preparation activities, you can also write to the school participation division for clearance to use a different document. For the workforce preparation activities, you could provide a description of how those employability skills are interwoven or explain other employability skills that the participants in this program will be gaining through your activities. You do have to prove that this is in demand in your state or regional labor market.

Here are some reports that you could do. Again, these are all 'or's. If you don't have access to a federal report, but you do have something from your state's

Department of Labor, that would be sufficient as well. You can also document some surveys, and how you worked with employers in your region that have jobs for the students you're putting through these programs.

Here are some things that you could submit as part of this E-App upload. Documentation about engagement with industry and meeting minutes. Talks with your workforce development boards. You do require counseling as well, so you could document that if you have brochures. If you just want to make a narrative of two pages or less, you can put those things in there.

Again, if the appropriate education is offered concurrently with workforce preparation activities and you have a MOU between different providers and the college, and it's a documented IET with some program documents, then you've got a lot of this done already.

We get a lot of questions about the high school diploma. Whatever program you're enrolling these students in, it must provide an opportunity for them to obtain that high school diploma while they're working towards the post-secondary component. The caveat is that you know your financial aid staff will work with you on this. Only the post-secondary component of the program is Title IV eligible, so when you're looking at the cost of the program and things like that, the financial aid staff will base that on the number of post-secondary credits or enrollment hours.

We will do a webinar on all those things because we may end up having some sort of toolkit or template that you can put all those things into with examples. That's how we get all the information together and you will upload that into the E-App. Your financial aid staff will do that.

World Education has an ATB ECPP documentation template that takes what I just showed you on those slides, what is in the "Dear Colleague" letter and that gives you some further examples. But this is not meant to be uploaded to the E-App. It basically gives you more of a checklist to get you on the same page of everything that you need to do with all these partners.

We have a lot of questions in the chat, and I see my colleagues are trying to answer some of them as they come in. If your question isn't answered in the chat or you have one later today, go ahead and e-mail either the DEAL program or me directly and we'll work with partners to answer those questions.

But I'm going to turn it over to Cheryl right now who has some questions that came in from the registration form and we picked some of those to respond to live. We'll get back to you if you have more specific questions for your situation. Cheryl?

 **Cheryl James** 43:23

Thank you. One of the questions that was quite popular is what does this funding cover exactly? We're going to ask Aaron to respond to that.

 **Washington, Aaron** 43:33

Okay. It's not program funding; it's Title IV aid that goes directly to the students. A student fills out the Free Application for Federal Student Aid, and we'll use the information put on the application to determine how much aid a student will receive, whether that's a Pell Grant, whether that's a federal student loan, whether that's work study or whether a Federal Supplemental Education Opportunity Grant. The FAFSA is the form that determines student eligibility. The student will then have to enroll in eligible programs. It's all about eligibility in the federal student aid, we call it Title 4A, but the federal student aid space, they must go to an eligible institution. They must enroll in an eligible program, and they have to be eligible themselves by filling out the FAFSA. And once all those things, all three of those things are in place, the student can use the Title 4A course they qualified for, to pay for tuition, fees, books, other supplies. All the allowable costs are outlined in the law governing federal student aid and what students can apply for. And the financial aid officers at schools are very well versed in this, and they'll be able to walk the student through their eligibility and what their aid can be applied to. There's a lot of information that we have in our Federal Student Aid Handbook. This is a handbook that we update every single year. Volume three, chapter two of the Federal Student Aid Handbook, is all about the cost of attendance, in our language, all the costs that are allowed to be covered based on the students' eligibility for federal student aid, like tuition or fees, books, and supplies.

 **Cheryl James** 45:16

Thanks, Aaron. Before we go to that handbook and read it, we're going to put you back on the hot seat and with another question, consider the use of Title IV funds at an adult school.

 **Washington, Aaron** 45:29

I talked a little bit about eligibility. The school must participate in the federal student aid program. There's thousands and thousands of post-secondary institutions, but they're not required to participate in Title IV programs like the Pell Grant program, the federal loan program. They apply to the Department of Education. The most

important thing is that the school is eligible. The program must also be eligible, because not every single program at every single school is eligible, and the student must be eligible. Most adults will be partnering with a community or technical college or other institutions of higher education for the post-secondary portion of the career pathway program. You need to make sure that the student enrolls in a Title IV eligible program.

The career pathway program has rules, and we also have rules for general program eligibility like the program length for example? To receive a Pell Grant, the program has to be a certain number of credit or clock hours, for a student to be eligible to receive Title IV aid to enroll in that program. If you want to know more about all the program eligibility requirements for Title 4A specifically, refer to Volume 2, Chapter 2 of the Federal Student Aid Handbook. Thank you.

 **Cheryl James** 46:56

Thanks Aaron. We don't know if we can read as fast as you speak, but we will look at those documents. We're going to talk to Erin now. Erin, can you tell us if all colleges utilize ATB?

 **Berg, Erin** 47:12

I think Aaron just touched on that. It's up to the colleges whether they want to participate in Title IV aid at all, and the colleges that participate in Title IV aid, must submit ECPPs to the department for approval.

It's up to them whether they want to go through that process, and if they have all the documentation, and if the financial aid staff and the leadership at the institution feel that they can support adult learners in these programs. It's a question of getting everyone on the same page of these great programs, we all agree on that. They're all well designed to contextualize education in a way that an adult without a high school diploma could be successful in the program. We have the counseling supports and everything else.

Let's go ahead and submit that and get approved. Every institution that's Title IV eligible is not automatically ATB eligible.

 **Cheryl James** 48:18

Great. Thank you. Judy, we're going to draw on your expertise now. There's a question on whether the student must complete their HS credential prior to being awarded the post-secondary credential?



**JM Judy Mortrude** 48:32

The short answer is no. It is possible for a student to complete their post-secondary credential faster than they complete their high school credential. What is required is that the student be enrolled in both programs and be able to complete both in the program. Answering Melissa's question in the chat, yes, the student is in a high school diploma or equivalency program and in post-secondary at the same time.

 **Berg, Erin** 49:05

I'll interrupt really quick to add something to that as well.

If you have a student that starts as an ATB student and then they are able to complete their GED, or they were able to qualify for an adult diploma some other way, if they get that before they finish the post-secondary credit, they actually become a regular student, so I don't think we've actually defined what a regular student is. That basically means a non-ATB student. And so, if they have that high school credential then they don't have to worry about ATB at all and they don't have to worry about being in a career pathway at all. But this is mainly designed so that the student can get started in those programs and complete one or both at the same time.

**CJ Cheryl James** 49:51

Great. Judy, we're coming back to you. What resources are available to community colleges and adult schools that have not yet promoted ATB?

**JM Judy Mortrude** 50:02

Well, there are going to be a lot more. So, keep an eye out for the future activities from the national project, DEAL. We will be forming a technical assistance opportunity for states and local colleges and releasing new guides and resources and more targeted webinars in the next year.

**CJ Cheryl James** 50:22

All right, thank you. We know that there were lots of questions. We tried to answer them both in our presentations and in this question- and- answer series. If you still have burning questions, or any additional information that you'd like to get a hold of, please email us at [deal@manhattanstrategy.org](mailto:deal@manhattanstrategy.org). We'll have that as part of our presentation slides. So, in terms of the next step, Judy is going to give you some more information on webinars and what's coming next.

**JM Judy Mortrude** 50:56

Alright, so if you're feeling confused, or feeling curious, or you're really ready to go, we have a couple things for you to tap on immediately. The first one takes place tomorrow.

The National College Council for Workforce, Education and World Education and Washington State Board of Community and Technical Colleges are going to do a webinar tomorrow afternoon. Same time. Today's presentation is really focused on these recent regulation changes and did talk a lot about the state process.

Tomorrow's webinar is going to focus more on implementing ATB in this new context, meeting the eligible career pathway program requirements, and showcasing some successful models from Washington State. If you can join us tomorrow, you will hear from the people who are getting this work done on the ground.

In the next slide, as I said, we will have a technical assistance plan for states and local colleges, and we will share information on that. It will include coaching and peer learning and sharing of opportunities. I will say there's a lot of amazing work happening at the state and local levels across the country and learning from peers is super valuable so we will try to facilitate a lot of that.

Finally, if you want to put write down any of your challenges or concerns, things that come to mind for you, or questions you still have, feel free to put those in the chat or to email them to us at [deal@manhattanstrategy.com](mailto:deal@manhattanstrategy.com). Hearing from you will really help us develop the right types of resources to support the challenges that you're facing.

So. thanks very much.

**CJ Cheryl James** 52:57

Thank you.



**Berg, Erin**

Thank you all.