

A young man with dark hair, wearing large black headphones, is looking intently at a laptop screen. He has his hand resting on his chin, appearing thoughtful. The background is blurred, showing what looks like a classroom or office setting with other people and lights.

NEW REGULATIONS FOR ABILITY  
TO BENEFIT ARE PENDING.  
WHAT DO THEY MEAN FOR  
ADULT CAREER PATHWAYS?

Judy Mortrude, World Education

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# What is ATB?

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ATB is an alternative path to eligibility for Federal student aid for students who do not have a high school diploma or its recognized equivalent.

**First**, a student must fulfill one of these alternatives:

Pass an independently administered test approved by the U. S. Department of Education.

Complete a State process approved by the Secretary of Education (“state-defined process”).

Complete at least 6 credit hours or 225 clock hours that are applicable toward a Title IV-eligible degree or certificate offered by the postsecondary institution.

**Then** the student must be enrolled in an eligible career pathway program.

# Student Eligibility

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

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

# Why Use an Ability to Benefit Strategy?

## Postsecondary Goals

State postsecondary rates –  
disaggregated by race

## Equity

Adult learners served equitably

## Evidenced-Based

Integrated Education & Training;  
Career Pathways

## Alignment

HEA/ WIOA/ Perkins CTE

## Sustainability

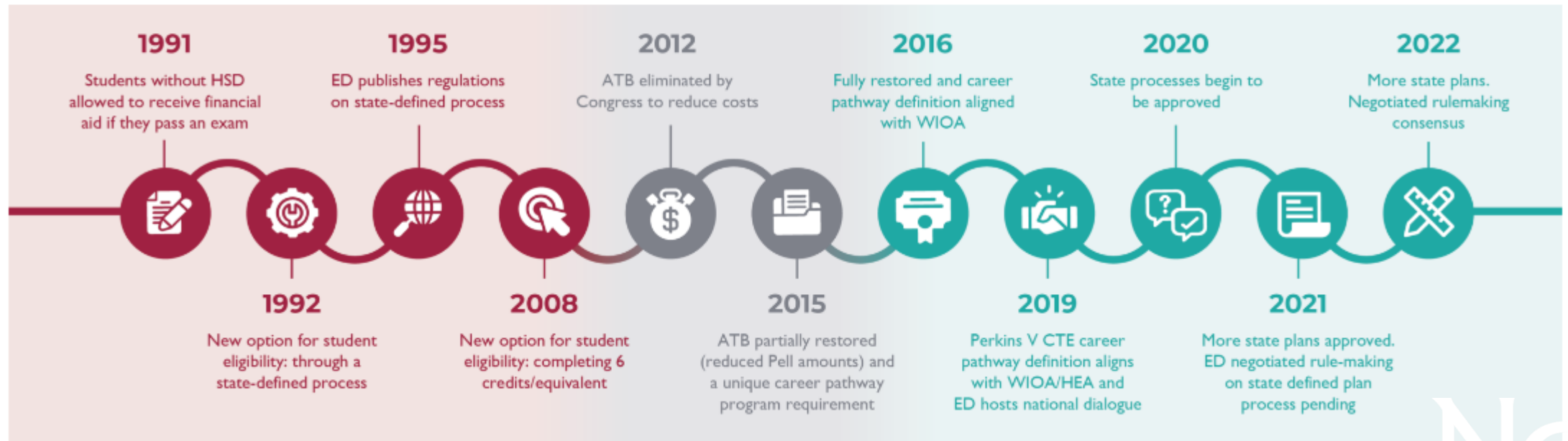
Pell Grant, federal student aid



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# Ability to Benefit

EVOLUTION CONFUSION PROGRESS



<https://www.collegetransition.org/career-pathways/featured-projects/ability-to-benefit/>

# Approved ATB Tests

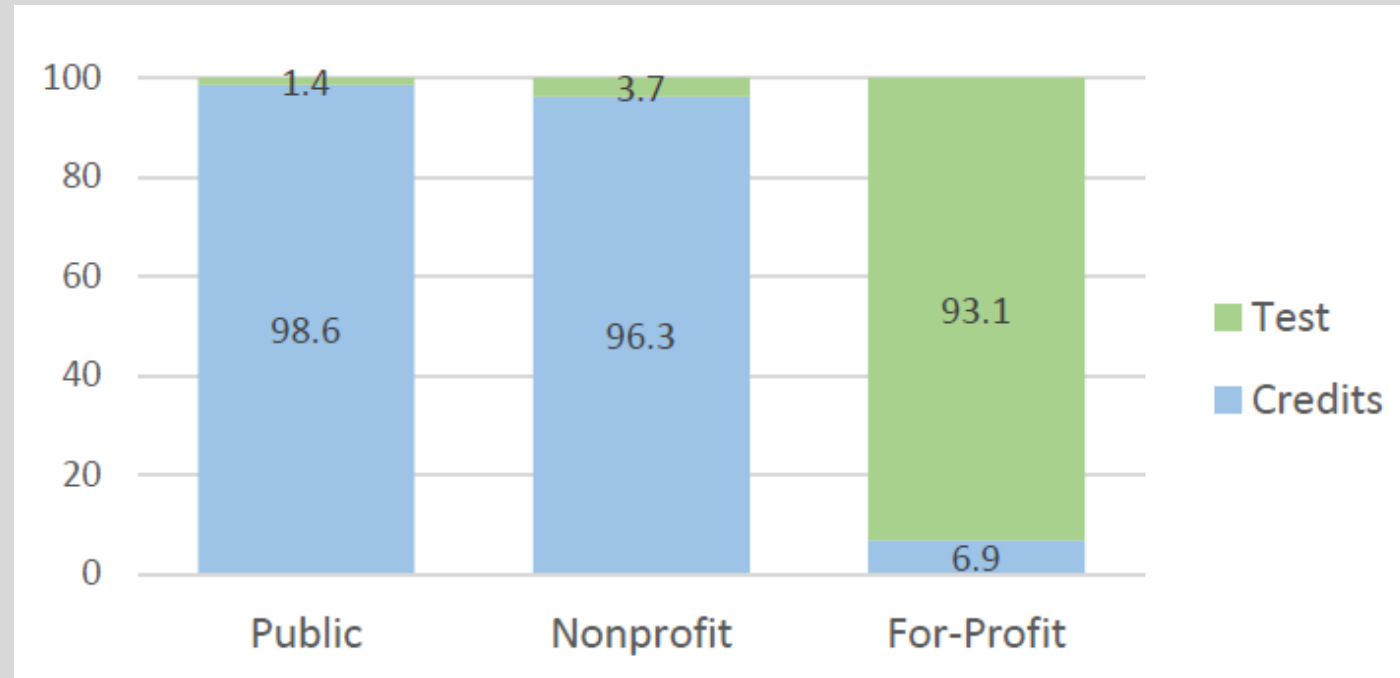
ATB test	Passing scores	Test publisher contact information
Wonderlic Basic Skills Test (WBST) Verbal Forms VS-1 & VS-2, Quantitative Forms QS-1 & QS-2 Paper and pencil versions and online versions. Effective Date: July 1, 2015	Verbal (200) Quantitative (210)	Wonderlic, Inc., 400 Lakeview Parkway, Suite 200, Vernon Hills, IL 60061. Contact: Chris Young. Telephone: (847) 247-2544. Fax: (847) 680-9492.
Spanish Wonderlic Basic Skills Test (Spanish WBST) Verbal Forms VS-1 & VS-2, Quantitative Forms QS-1 & QS-2 Paper and pencil versions and online versions. Effective Date: July 1, 2015	Verbal (200), Quantitative (200)	
Combined English Language Skills Assessment (CELSA),* Forms 1 and 2 Effective Date: November 1, 2002	CELSA Form 1 (97), CELSA Form 2 (97)	Association of Classroom Teacher Testers (ACCT), 1187 Coast Village Road, Suite 1, #378, Montecito, CA 93108. Contact: Pablo Buckelew. Telephone: (805) 965-5704. Fax: (805) 965-5807.
**ACCUPLACER Computer-adaptive tests and COMPANION ACCUPLACER Forms J and K: Reading Test, Writing Test, and Arithmetic Test	Reading Test (233),** Writing Test (235),** Arithmetic Test (230)**	The College Board, 250 Vesey Street, New York, NY 10281. Contact: ACCUPLACER Program. Telephone: (800) 607-5223. Fax: (212) 253-4061.
** Texas Success Initiative (TSI) Assessment— Computer-adaptive tests and COMPANION TSI Forms T and V: Reading Placement Test, Writing Placement Test, Mathematics Placement Test	Reading Placement Test (336), Writing Placement Test (345), Mathematics Placement Test (326)	

\* **Note:** As provided in [34 CFR 668.153\(a\)\(2\)](#), the CELSA test is approved as the additional ATB English language proficiency test that must be taken by students whose native language is not English and who are not fluent in English if the academic program includes an ESL component.

\*\* The ACCUPLACER test has been redesigned since it was listed as an approved test in the 2006 notice. TSI is a new addition to the list of approved ATB tests. These tests are provisionally approved. To move from provisional approval to full approval the test publisher must submit additional information as noted in the test agreement signed by the test publisher and the Department, no later than two years from the effective date of the agreement 6/26/2020. In the event the Department denies full approval, we will provide notice of this through publication in the **Federal Register**, pursuant to [34 CFR 668.150\(c\)\(3\)](#).

<https://www.federalregister.gov/documents/2020/11/09/2020-24795/list-of-approved-ability-to-benefit-atb-tests-and-passing-scores>

# For-Profits Use the Test Option



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

# Credit Alternative

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“Completing at least 6 credit hours or 225 clock hours that are applicable toward a Title IV-eligible degree or certificate offered by the postsecondary institution (neither remedial nor developmental coursework count toward this requirement). The coursework must demonstrate that the student has the ability to benefit from the postsecondary program in which the student is enrolled or intends to enroll, but need not be applicable to the specific degree or program in which the student is enrolled.”



# State Defined Plan Option

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1. Illinois
2. Iowa
3. Minnesota
4. Mississippi
5. Washington
6. Wisconsin

State Process Webinar Slides: <https://ifap.ed.gov/dear-colleague-letters/ann2002>

Questions? [atbstateprocess@ed.gov](mailto:atbstateprocess@ed.gov)



# Eligible Career Pathway Program

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Institutions make their own determination whether a career pathway program is ATB-eligible and must document the basis for this determination.

- Some colleges have used this optional checklist from OCTAE to help document their programs' eligibility: <https://lincs.ed.gov/publications/topic/wioa/careerpathways-checklist.pdf>

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# § 668.157 Eligible Career Pathway Program

(a) An institution demonstrates to the Secretary that a student is enrolled in an eligible career pathway program by documenting that--

(1) The student has enrolled in or is receiving **all three of the following elements simultaneously** --

(i) An eligible postsecondary program as defined in § 668.8

(ii) **Adult education and literacy activities under the Workforce Innovation and Opportunity Act as described in 34 CFR 463.30 that assist adults in attaining a secondary school diploma or its recognized equivalent and in the transition to postsecondary education and training; and**

(iii) **Workforce preparation activities as described in 34 CFR § 463.34.**

(2) The program aligns with the skill needs of industries in the State or regional labor market in which the institution is located, based on research the institution has conducted, including--

(i) Government reports identifying **in-demand** occupations in the State or regional labor market;

(ii) Surveys, interviews, meetings, or other information obtained by the institution regarding the hiring needs of employers in the State or regional labor market; **and.**

(iii) **Documentation that demonstrates direct engagement with industry;**

## § 668.157 Eligible Career Pathway Program

(3) The skill needs described in paragraph (a)(2) of this section align with the specific coursework and postsecondary credential provided by the postsecondary program or other required training;

(4) The program provides **academic and** career counseling services that assist students in **pursuing their credential and** obtaining jobs aligned with skill needs described in paragraph (a)(2) of this section, and identifies the individuals providing the career counseling services;

(5) The **appropriate** education is offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster **through an agreement, memorandum of understanding, or some other evidence of alignment of postsecondary and adult education providers that ensures the secondary education is aligned with the students' career objectives ;** and

## § 668.157 Eligible Career Pathway Program

(6) The program is designed to lead to a valid high school diploma as defined in § 668.16(pv) of this part or its recognized equivalent.

(b) For career pathway programs that do not enroll students through a State process as defined in § 668.156, the **Secretary** will verify the eligibility of eligible career pathway programs for title IV, HEA program purposes pursuant to **paragraph (a) of this section**. The Secretary provides an institution with the opportunity to appeal any adverse eligibility decision.



**Ability to Benefit Resource Page - NCTN**

[www.collegetransition.org](http://www.collegetransition.org)



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# Resources

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ATB Resource Page – all you need!

[www.collegetransition.org/career-pathways/featured-projects/ability-to-benefit/resource-page/](http://www.collegetransition.org/career-pathways/featured-projects/ability-to-benefit/resource-page/)

Interested in commenting on the proposed regulations?  
Email me!

[Judy\\_Mortrude@worlded.org](mailto:Judy_Mortrude@worlded.org)



THANK YOU!

[Judy\\_mortrude@worlded.org](mailto:Judy_mortrude@worlded.org)

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