



Wisconsin Technical College System

WTCS Process for Ability to Benefit

INTRODUCTION

The Wisconsin Technical College System (WTCS) Board is the coordinating and oversight body for the state's technical colleges. The 13-member Board establishes statewide policies and standards for educational programs and services provided by the 16 technical colleges that make up the WTCS and is responsible for administering state and federal aids to the colleges.

The Wisconsin Technical College System Office (System Office) is the administrative and coordinating agency of the WTCS Board. The System Office implements statewide policies and standards established by the WTCS Board and administers state funding provided for technical college programs and services, to ensure quality, accountability, and efficiency. It also monitors and reports on federal requirements related to technical college operations and administers funding received under the federal Carl Perkins and Adult Education and Family Literacy Acts.

According to 2017 census information, there are 4,469,267 individuals that make up the total adult population in Wisconsin. Of this total, 387,131 individuals have no high school diploma (8.7%). In addition, 69,857 (1.6%) are reported as "speaking English less than very well". This means approximately one in ten adults across Wisconsin are affected by employment and educational barriers. Every year, WTCS enrolls nearly 15,000 adults in a basic skills program where they can earn a high school credential, develop vocational skills, and continue their academic pursuits to achieve additional credentials that may be needed for reaching their educational or employment goals.

Wisconsin's 16 technical colleges offer over 500 career pathway programs that award two-year associate degrees, one- and two-year technical diplomas, short-term technical diplomas, and certificates. In addition, WTCS provides classroom instruction for registered apprentices and is a major provider of customized training and technical assistance throughout the state. Over 300,000 individuals access Wisconsin's technical colleges each year.

A successful practice of the colleges has been the integration of high school-level instruction with a WTCS career pathway program. This concurrent enrollment allows students to earn a high school credential while working on a career pathway that accelerates their ability to enter the workforce or advance within their chosen field, rather than pursuing each of these goals independently. However, there is a limiting factor impacting access to these opportunities – financial supports.

Currently, in order to be eligible for federal financial aid through Ability to Benefit (ATB), students must be enrolled in a career pathway program, lack a high school diploma, GED, or its recognized equivalent, and fulfill one of three criteria demonstrating they have the "ability to benefit" from receiving aid. The ATB eligibility options are: passing an ATB acceptable academic assessment or entrance exam, completing 6 college credits (or equivalent) without financial aid, or qualifying for and completing a state-defined ATB eligibility process. Unfortunately, the same social-economic barriers that prospective ATB students have likely faced in the past often remain a hindrance to their qualifying for Ability to Benefit under the first two eligibility criteria.

This leaves the third eligibility criterion – following requirements of a *state-defined* ATB process – as an option for determining candidacy and increasing qualified student enrollment under Ability to Benefit at the state level if the process is approved. Capitalizing on this opportunity, the WTCS is proposing a state eligibility process containing additional assessment that can be used when identifying students who have the "ability to benefit" and should be eligible for enrollment under ATB. Under the WTCS ATB eligibility process, students can enter a WTCS career pathway program and obtain funding for applicable tuition/fees under Title IV federal aid. Additionally, this process will be accessible for students of all backgrounds, abilities, and socioeconomic levels, and it will be especially beneficial for low-income and first-generation college students.

PROCESS HIGHLIGHTS

The WTCS Ability to Benefit Process provides the following:

- A list of WTCS institutions that will have an opportunity to take part in the WTCS Ability to Benefit Process
- Calculations and reporting of the rate of success, as defined by the Department of Education, using established resources and reporting systems
- Required services that will be provided to ATB students by the participating institutions, including but not limited to – (a) student orientation, (b) tutoring/academic support, (c) comprehensive academic assessments to determine each student’s existing capabilities, (d) assistance with achieving educational milestones and goals, (e) individualized academic counseling that incorporates an understanding of each student’s appropriate class level enrollment or career pathway entry points, and (f) faculty/counselor follow-up regarding each student’s classroom performance and their progress towards academic goals and/or program completion
- Criteria for determining good candidates for enrollment in ATB and a summary of academic supports
- Provisions for annually monitoring participating institutions, enforcing corrective actions with participating institutions to maintain state and federal compliance, and terminating participating institutions from ATB participation should there be continued non-compliance

POTENTIAL PARTICIPATING INSTITUTIONS

1. Blackhawk Technical College
2. Chippewa Valley Technical College
3. Fox Valley Technical College
4. Gateway Technical College
5. Lakeshore Technical College
6. Madison Area Technical College
7. Mid-State Technical College
8. Milwaukee Area Technical College
9. Moraine Park Technical College
10. Nicolet Area Technical College
11. Northcentral Technical College
12. Northeast Wisconsin Technical College
13. Southwest Technical College
14. Waukesha County Technical College
15. Western Technical College
16. Wisconsin Indianhead Technical College

DATA REPORTING STANDARDS

Currently, the WTCS uses several data reporting methods and resources to accurately monitor and analyze student data. The primary data repository source used by the colleges is the Client Reporting System. The Client Reporting System is a secure, centralized interface through which data can be input, retained, and retrieved. Client Reporting allows authorized users to access data and generate reports, and those reports are then analyzed and used for monitoring or measuring performance.

The WTCS Process for Ability to Benefit will ensure that the all required data can be accessed for the purpose of calculating the rate of success for students within participating institutions. To do this, each new student admitted to a WTCS college program under the WTCS Process for Ability to Benefit will be coded for identification purposes within the Client Reporting System. This code will be used by the System and participating institutions to retrieve and review ATB-specific data and monitor the students enrolled in the WTCS State Process for Ability to Benefit. Incorporating the task of reporting Ability to Benefit data will be seamless.

REQUIRED SERVICES

Under the WTCS Process for Ability to Benefit, participating colleges are required to provide each participating ATB student with comprehensive supports and services. Evidence of support and student engagement are essential to the student's success. These services include:

- **Student Orientation:** The orientation should familiarize students with the college's policies, campus resources, student rights, and the institution's academic standards and requirements. Orientation should also include information regarding the use of common administrative forms, the use of online learning management systems (including online courses), how to interpret educational terminology/jargon (i.e., FAFSA, GPA, etc.), how to complete online registration processes, how to access web-based student accounts/email/grades, how to access student financial information and billing statements, and the key components of student financial aid options and requirements (34 CFR 688.156 (c)(1)).
 - Satisfactory academic progress measures will be used to monitor the progress and success of ATB students. Students should understand and agree to the ATB Process requirements and expectations. Students should understand the correlation between meeting these requirements and maintaining student financial aid eligibility
- **Assessment:** Students will be provided the opportunity to demonstrate academic capabilities through means other than a single standardized test. Colleges can look at multiple forms of cognitive assessment, such as ACCUPLACER, GED test(s), GED predictor test(s), and other qualifying assessment methods; furthermore, the WTCS supports the best practice of conducting student assessments across multiple measures, and colleges within our System are also encouraged to consider career interests and noncognitive factors with the aim of developing comprehensive student assessment profiles (34 CFR 688.156 (c)(2)).
- **Tutoring/Academic Support:** Tutoring/academic support must be provided as appropriate to each student's needs. Services must be free for students and provided by professional tutors, instructors, online/virtual services, and/or other individuals who are trained to provide academic tutoring or support services. The college must monitor all ATB students' participation in tutoring/academic support activities, and student participation in tutoring/academic support services should be required if a student is not making satisfactory progress. In these cases, simply making a referral for tutoring/academic support would be an insufficient level of student intervention and would not be compliant with the WTCS Process requirements (34 CFR 688.156 (c)(3)).
- **Connecting Academic Goals to Career Pathways:** Students must be provided professional assistance in developing and mapping out their educational and career goals, and students should also be taught how to access their educational information for the purpose of monitoring their own progress towards these goals. Students should be made aware of the clear connections between their academic and career goals, and they should also be provided with educational and training opportunities that are directly applicable to their desired career or industry. Students will also be instructed in the process of making changes or modifications to their academic plan and how these modifications may affect their career goals (34 CFR 688.156 (c)(4)).
- **Counseling and Advising:** The terms *counseling* and *advising* might also be referred to as *case management*. This service will be customized to each student, and it will include components of a holistic student support model. Other important provisions of this service will be assisting students in creating personal education plans that map their academic goals to career goals, identifying academic and non-academic supports, and addressing the function(s) of financial aid or other financial resources that will help the student reach their goals. The WTCS Process will require a multi-faceted approach to counseling/advising services, this includes providing career, academic, and financial information as needed (34 CFR 688.156 (c)(5)).
 - Participants must enroll in a Title IV eligible program with a goal of completing the program. The college should not enroll a student in an educational program that is not consistent with the student's career and educational goals
- **Measuring Progress & Student Follow-up:** Students must be provided with follow-up regarding their classroom performance and any progress made towards their educational and career goals. These follow-up services must be provided by teachers, counselors, case managers, advisors, and/or others who are appropriately trained to function in such a role ((34 CFR 688.156 (c)(6)).

- Elements of satisfactory progress could include attainment of credential milestones like passing one or more GED tests, successful course completions, etc. Other elements of progress could include required use of tutoring or other academic supports, required basic skills course attendance, attendance at required case management meetings, and other requirements set by the college

ELIGIBILITY & PROGRAM DESIGN

- **Candidate Eligibility:** WTCS's Process for Ability to Benefit defines eligibility as any adult student (beyond the age of Wisconsin Compulsory Education) who *does not* meet other ATB eligibility criteria, and who:
 - has a minimum reading level of 9th grade/NRS 5 OR
 - meets at least NRS 5 for English Language Learning (ELL) in reading and writing AND
 - meets any other program academic requirements (such as math and/or writing) or other prerequisites in order to maximize student success and positive outcomes.

Candidate eligibility should be closely monitored, determining which students that would benefit from ATB enrollment. Therefore, when determining student eligibility, these competencies should be analyzed using the documented method(s) and evidence that are available (e.g., TABE, GED, or potentially using documentation of competency through Wisconsin's HSED process or WTCS's Credit for Prior Learning process). Furthermore, students are required to be enrolled in an eligible career pathway program, as defined under [20 U.S.C. § 1091\(d\)\(2\)](#).

- **Program Design:** The WTCS Process for Ability to Benefit is designed to assist students and prospective students that have not earned a high school diploma or meet the other alternative ATB eligibility criteria (i.e., successfully completing a standardized assessment/exam or successfully completing 6 college-level credits). The WTCS Process recommends that participating students be encouraged to consider concurrent enrollment for completion of a high school credential (GED) for ATB students, wherein the student is making satisfactory progress toward both a high school credential or its equivalent and an approved post-secondary occupational program/career pathway.

MONITORING & COMPLIANCE

WTCS will annually monitor each of the participating institutions for compliance within the WTCS Process for Ability to Benefit requirements and standards of service. WTCS will identify corrective action(s) if an institution is found to be noncompliant with the WTCS Process for Ability to Benefit requirements, and WTCS may terminate an institution's participation if the institution does not meet the goals established by the corrective action(s) as per 34 CFR 668.156 (d).

In acknowledgement of the program requirements, including the expected performance measures, and related monitoring and compliance, WTCS has developed an ATB Memorandum of Understanding (MOU) to guide the colleges that will participate in the state defined ATB process. By agreeing to the MOU, WTCS institutions will confirm their commitment in complying with the state defined process and agree to provide the following to the WTCS:

- A list of the career pathway(s) ATB eligible students will be able to participate in;
- An explanation of the institutional process for identifying students who may benefit from ATB and how the institution intends to recruit and educate students about ATB before students commit to participation;
- An acknowledgement that the institution will track student participation in ATB and report ATB participants within the WTCS Client Reporting System for state success rate performance analysis; and
- An explanation of how the institution will monitor and ensure all students participating in ATB receive each of the six services:
 1. Orientation regarding the institution's academic standards and requirements, and student rights;
 2. Assessment of each student's existing capabilities through means other than a single standardized test;
 3. Tutoring in basic verbal and quantitative skills if appropriate;
 4. Assistance in developing educational goals;

5. Counseling and advising, including advisement regarding the appropriate class level for that student given the student's individual capabilities; and
6. Follow-up by teachers and counselors regarding the student's classroom performance and satisfactory progress toward program completion.

WTCS will review the submitted information to confirm the institution demonstrates commitment in complying with the state defined process. If approved, the institution will be required to participate in the following activities to support WTCS monitoring of institutional compliance with the state defined process:

- Participate in a one-day professional development training hosted by the WTCS to explore the state defined ATB process and compliance requirements;
- Participate in quarterly calls and/or webinars hosted by the WTCS to discuss state defined process requirements and strategies in scaling ATB for eligible students;
- Participate in training offered by the WTCS regarding monitoring and compliance with reporting ATB participants through the WTCS Client Reporting System and to review ATB success rates for reported participants; and
- Submit to the WTCS an annual end-of-year amendment to the previously approved WTCS ATB MOU with changes for the next academic year e.g. identify newly developed career pathways that ATB eligible students can enroll.

Approved institutions will also be required to report ATB participant student-level data through the WTCS Client Reporting System during each academic year. The Client Reporting System is a longitudinal reporting system that collects more than 100 data elements including student demographics, student level of education, course enrollments, course grades, student services received, basic education testing, grant services received, program enrollments, and program completions. The collection of this data across all WTCS institutions allows for robust analysis to support ATB monitoring efforts and has been a strength to the WTCS's Adult Education and Family Literacy Act (AEFLA) and Perkins federal accountability, monitoring, and improvement efforts. Building on these successes, each approved institution will be required to report the necessary ATB data elements to allow the WTCS to monitor compliance with the state defined process including but not limited to:

- ATB participation status;
- Level of high school education;
- Participation in each of the six required ATB student services;
- Enrollment in a career pathway program; and
- Completion of the career pathway program.

WTCS has developed an ATB-approved institution evaluation model to support the ongoing monitoring of institutional compliance with the state defined ATB process and to inform technical assistance intervention. This model will incorporate a series of performance measures to assess overall compliance with the state defined plan. Areas of assessment will include:

- Quantity of ATB students reported;
- ATB students' level of high school education;
- ATB student enrollment in a career pathway program;
- ATB student participation in each of the six required ATB student services; and
- ATB success rates as defined by the US Department of Education.

Monitoring ATB student activity in these areas will provide the WTCS with information to ensure ATB students are being correctly reported, are participating in the ATB required student services, and have successful outcomes. Further, monitoring in these areas will provide diagnostic information to guide WTCS technical assistance intervention.

CORRECTIVE ACTION

Each approved WTCS institution will be held accountable to maintain compliance with the state defined

process. Institutions who fail to maintain compliance through WTCS monitoring efforts will be required to take corrective action. In the first year of noncompliance, the WTCS will intervene with technical assistance and the institution will be required to develop and share with the WTCS a local improvement strategy. Within the local improvement strategy, the institution will be asked to:

- Identify the component(s) within the state defined process that are not in compliance;
- Identify and provide data as necessary to substantiate factors believed to be contributing to noncompliance e.g. significant reduction in staff, limited understanding of ATB across the institution, challenges in tracking students participating in ATB, etc.;
- Identify a timeline and specific actions the institution will take to address the component(s) within the state defined process that are not in compliance; and
- Identify how the institution will monitor progress to implementing the actions to address the component(s) within the state defined process that are not in compliance.

The WTCS will monitor institutions implementing local improvement strategies through quarterly meetings to discuss progress and challenges to implementing the local improvement strategy.

DEMONSTRATED SUCCESS RATES

WTCS has a history of collecting the necessary data to calculate a series of federal accountability measures and WTCS continuous improvement measures. WTCS currently reports the required AEFLA WIOA performance measures through the National Reporting System on an annual basis. These measures include Measurable Skill Gain, employment in the 2nd and 4th quarter after exit, median earnings in the 2nd quarter after exit, and credential attainment.

To generate these measures, WTCS collects the required AEFLA participant data through the WTCS Client Reporting System and has established a series of data sharing agreements with the state unemployment insurance wage system, the K-12 department of public instruction, and the National Student Clearinghouse to assess AEFLA participant employment outcomes, GED/HSED attainment, and transition to postsecondary education outside of the WTCS.

Similarly, WTCS currently reports the federally required Perkins performance measures for CTE concentrators on an annual basis. WTCS also calculates a series of local continuous improvement measures to assess and improve WTCS student outcomes. These measures include program completion, program retention, successful course completion, program student transfer, and program graduate job placement and earnings. WTCS can analyze these measures at the program and student level and can disaggregate outcomes across course enrollment and student characteristics such as economically disadvantaged status, race/ethnicity, gender, age, disability status, and first-generation status to identify equity gaps in student outcomes.

WTCS has the capacity to produce the required state success rate as defined by the US Department of Education. With the approval of the WTCS state defined ATB process, WTCS students participating in ATB and those not participating in ATB will be identified and reported by approved institutions through the WTCS Client Reporting System. Data to identify completion of a high school credential or its equivalent, program completion, continuous enrollment, and successful transfer among the required student populations will be available for analysis through the WTCS Client Reporting System and supplemental data matches through the National Student Clearinghouse. Student success rates will be calculated by the WTCS at the end of each year for each WTCS ATB institution. Results will help to inform compliance with the state defined process and to identify WTCS technical assistance needs.

TERMINATION OF PARTICIPATION

WTCS and related institutions acknowledge that ATB student completion rates must be within 95% of the completion rate of students who have a high school credential, GED, or recognized GED equivalent as per 34 CFR 668.156 (h). If an approved WTCS institution fails to implement a required local improvement strategy after noncompliance with the state defined process or maintains noncompliance after implementing a required local improvement strategy, the institution will not be eligible to participate in the state approved process for the remainder of the Secretary approved state process period.

The participating institution's President, Vice President of Instruction, Vice President of Student Services, and Financial Aid Manager will receive a written notification from WTCS Leadership indicating that the institution has lost eligibility to participate in the state approved process for the remainder of the Secretary-approved state process period. Eligibility will not be reinstated until additional WTCS-led technical assistance identifies if the steps identified in the corrective action phase of the institution's monitoring report have been met, along with any additional necessary actions to be addressed as identified by WTCS staff.

Questions about the WTCS Process for Ability to Benefit should be directed to:

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