

Washington State-defined Process for Ability to Benefit

Introduction

The Washington State Board for Community and Technical Colleges (State Board) is governed by a nine-member, governor-appointed board responsible for administering the Community and Technical College Act and providing leadership and coordination for Washington state's system of 34 public community and technical colleges. The State Board supports and empowers the Washington state community and technical colleges to increase higher education opportunities and student participation through advocacy, resources, information, leadership and accountability.

The State Board's Education Division focuses on three mission areas: Academic transfer, Workforce education, and Basic Education for Adults. Basic Education for Adults administers funding received from the Workforce Innovation and Opportunity Act (WIOA) Title II Adult Education and Family Literacy Act (AEFLA) along with appropriated state funding. Basic Education's mission is to provide research-proven instruction and college and career readiness pathways that allow adults to master academic and technical skills to attain their career and educational goals and successfully navigate education and employment opportunities. Basic Education believes that the values of diversity, equity, and inclusion strengthen the basic skills community and are critical to providing opportunities that support the success of underrepresented students, students of color, and low-income students in attaining a quality education that leads to self-sustaining employment.

According to the National Association of State Directors of Adult Education (NASDAE) [Adult Education Facts Sheet](#), 420,078 of Washington state's residents age 18 and over are in need of a high school credential, or 7% of the state's population. In the 2021-2022 academic year, Washington state colleges served 38,066 students with basic skills needs. Over 58% of these students are students of color. Washington state's [2013 Roadmap](#) sets the attainment goal that by 2023, all adults in Washington, ages 25-44, will have a high school diploma, and at least 70 percent will have a postsecondary credential. These goals are supported by the State Board's "[Tipping Point](#)" research, which determined that the biggest earnings bumps for students occur when they earn a year of college credit and a workforce credential.

In response to the Tipping Point research, in which the State Board learned that only 4-6% of 35,000 pre-college students made it to the Tipping Point after five years of tracking, the State Board created the Integrated Basic Education and Skills Training or I-BEST model. I-BEST places adult education students directly into college credit-bearing career pathways that lead to high demand, living wage jobs. I-BEST challenges the traditional notion that students must move through a set sequence of basic education courses before they can start working on certificates and degrees. The combined teaching method at the heart of I-BEST allows students to work on college-level studies much more quickly than in traditional models, and the required navigational services connects students to resources and guides them to completion. The State Board approves all [professional-technical degree and certificate programs](#) prior to I-BEST implementation through a highly rigorous review and approval process. All I-BEST programs undergo a further [review process](#) in which colleges are required to integrate outcomes

and meet other WIOA Integrated Education and Training (IET) requirements, including ensuring that completers will earn certificates and degrees that lead to high demand, living wage jobs.

Fifteen years after its original pilots, I-BEST is considered the [gold standard](#) nationwide for IET (Center for Law and Social Policy, 2016). Success rates for students in I-BEST programs are much higher than for students in traditional programs. The [Community College Research Center](#) out of Columbia University found that I-BEST students are three times more likely to earn college credit than traditional Adult Basic Education/English Language Acquisition students, and nine times more likely to earn a postsecondary credential (Wachen et al, 2012.) According to a [net impact study](#) done on the workforce development system in Washington state, I-BEST completers gain substantial labor market outcomes with a 12.3% increase in employment, a 65 hour quarterly increase in hours worked, and an average earnings increase of almost \$1000.00 per quarter (Hollenbeck et al, 2016.) As of 2019, no less than 91% of all I-BEST students earned at least six college credits compared to 17% of all Basic Education for Adults students (SBCTC Research dashboard.)

Of course, for students and employers, high school completion is still a desired goal. There are many ways to obtain a high school credential as an adult resident of Washington state. If a student earns a two-year degree from one of our thirty-four community and technical colleges in the state, they can merely check a box and [receive a high school diploma](#). They can also study for the GED. However, in Washington state two-thirds of our living wage jobs require a postsecondary credential – not necessarily a two-year degree – in addition to a high school credential. For these students, co-enrollment in our High School+ and I-BEST programs brings the Tipping Point within reach, moving students to and through postsecondary programs that lead to living wage work and a robust state economy. [High School ±](#) is a competency-based high school completion program that results in a Washington state high school diploma. It awards credit for prior learning, military, training and work experience. Because it is competency-based, students can complete coursework through I-BEST and have that same coursework count toward the completion of a high school diploma, saving the student both time and money and accelerating Washington state toward its completion goals.

Washington state is a '[Guided Pathways](#)' state, whereby colleges are grouping courses together to form clear paths through college and into careers. Guided Pathways efforts focus on helping more of our students – especially low-income, first-generation students and students of color – earn credentials with labor market value to prepare them for entry into higher-paying, high-demand fields. Co-enrollment in I-BEST and High School+ is our foundational strategy for serving basic skills students in the guided pathways framework.

The final piece of pathway design is funding for students. Ability to Benefit provides eligible students with the funding they need to retain in their programs, complete, and enter/upskill in the workforce. Currently, students may be determined eligible for Ability to Benefit if, in addition to being enrolled in an eligible career pathway program, they:

- “Take an independently administered examination and...achieve a score, specified by the Secretary, demonstrating that such student can benefit from the education or training being offered.”

- Achieve “satisfactory completion of 6 credit hours or the equivalent coursework that are applicable toward a degree or certificate offered by the institution of higher education.” (HEA Sec. 484(d))

As the law states, part of demonstrating the effectiveness of an ATB-eligibility process dictates that the Secretary “take into account the cultural diversity, economic circumstances, and educational preparation of the populations served by the institutions.” In Washington state many of our residents in need of a high school and postsecondary credential struggle to pay out-of-pocket for the first six college credits, or have been out of school for many years and have difficulty passing an exam. These realities place the potential of Ability to Benefit out of reach for many students who would in fact benefit from and succeed with federal student aid.

Thankfully, the law permits students to demonstrate ability to benefit from federal student aid “in accordance with such process as the State shall prescribe.” Over the past three years there has been a consistent increase in the use of ATB across the state. There has also been demonstrated successful outcomes for students who are enrolled in the Washington State process as described in the Ability to Benefit Success Rate Research Brief (see Attachment A). In order to serve more students in eligible career pathway programs and thus boost individual and national economic growth, Washington state proposes the renewal of the state-defined process for determining Ability to Benefit eligibility for students.

Process Highlights

The Governor supported, Washington State-defined Process for Ability to Benefit provides the following:

- A list of State Board institutions that will have an opportunity to take part in the State-defined 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) Orientation;
 - b) Assessment through means other than a single test;
 - c) Tutoring;
 - d) Career Goal Development;
 - e) Counseling;
 - f) Follow-up regarding student progress.
- 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. Bates Technical College
2. Bellevue College

3. Bellingham Technical College
4. Big Bend Community College
5. Cascadia College
6. Centralia College
7. Clark College
8. Clover Park Technical College
9. Columbia Basin College
10. Edmonds Community College
11. Everett Community College
12. Grays Harbor College
13. Green River College
14. Highline College
15. Lake Washington Institute of Technology
16. Lower Columbia College
17. North Seattle College
18. Olympic College
19. Peninsula College
20. Pierce College – Fort Steilacoom
21. Pierce College – Puyallup
22. Renton Technical College
23. Seattle Central College
24. Shoreline Community College
25. Skagit Valley College
26. South Puget Sound Community College
27. South Seattle College
28. Spokane Community College
29. Spokane Falls Community College
30. Tacoma Community College
31. Walla Walla Community College
32. Wenatchee Valley College
33. Whatcom Community College
34. Yakima Valley College

Data Reporting

Washington state leverages its substantial data resources to pursue evidence-based policies at every level, and the keystone to these efforts is the State Board Data Warehouse. Among the many databases available in the warehouse is the Washington Adult Basic Education Reporting System, which provides stakeholders with both student baseline and progression data snapshots on a quarterly basis. This database becomes even more powerful when joined to enrollment, transcript, completion, and employment outcomes data sources in the warehouse. This enables the State Board to track longitudinal student outcomes from the day the student steps foot on campus to several quarters after exit. The database includes indicators for both High School+ and I-BEST, allowing the State Board to monitor co-enrolled student progress. State Board data is currently used to allocate performance-based

funding, track the success of the Guided Pathways initiative, and monitor program performance each quarter, among other uses.

Required Services

Under the Washington State-defined Process for Ability to Benefit, participating colleges will provide each participating Ability to Benefit student with comprehensive services:

Student orientation

Students who co-enroll in I-BEST and High School+ undergo rigorous orientation. Upon entering the High School + program, each student works with an advisor to assess what the student has already learned through life, work, school, or military experience. Together, they develop a plan to complete the rest of what the student needs in order to earn a degree. In I-BEST, each student is assigned a navigator. Navigators work with each student to make sure they meet eligibility requirements, have a solid understanding of the educational and career pathway, and have the needed support to complete enrollment and funding processes. Co-enrollment in these programs provides intense wraparound supportive services to each student that include information on academic standards and requirements as well as student rights.

Assessment through means other than a single test

High School+ and I-BEST use multiple measures for assessment. Through High School+, programs can use the High School Credit Option to measure and report educational gains by awarding required high school credits instead of testing. In I-BEST students are assessed on program outcomes and the College and Career Readiness Standards through integrated assessment instruments developed during the program design process. While CASAS scores can be used to assist in the initial process of co-enrolling students in I-BEST and High School+, and measure skills gains along the way, it is the documentation of real classroom learning through outcomes and standards assessment in both secondary and postsecondary credential programs that drive the demonstration of student success and progress within their eligible career pathway program.

Tutoring

One of the key advantages of the I-BEST model is the delivery of integrated outcomes instruction through team teaching. Team teaching places adult education instructors in the college course to teach alongside the professional-technical instructor. Through direct instruction in the college course as well as continued support in a “support” course, students receive just-in-time assistance with acquiring the basic skills needed to be successful in their eligible career pathway program. Navigators assist in connecting students to additional campus tutoring supports as needed.

Education and Career Goal Planning

Navigators and faculty jointly assist students in understanding career pathways and developing educational plans. All BEdA students are required to be on a college/career pathway that leads to living wage work; navigational services in High School+ and I-BEST enhance this requirement with intensive wraparound supports that include short and long-term career goal setting. I-BEST programs are required to have detailed maps of career pathways that include credentials needed and wage progression. After completion of their I-BEST pathway, students can either enter the workforce with skills and certifications

needed for living wage work, or enroll in the next set of courses in their pathway that leads to degrees, including transfer and applied baccalaureate degrees.

Counseling

“Counseling” in the Washington state community and technical college system is done by navigators and advisors and includes wraparound supports related to pathway and course selection, retention and completion, coaching, access to financial and other community resources, and other services designed to support students in their work toward certificates and degrees leading to living wage employment. I-BEST and High School+ both provide these intensive supports.

Follow-up regarding student progress

Faculty and navigators both support students in understanding their assessments and progress to completion. I-BEST is college-level programming and students receive assessments and grading in the same manner as all college students. Navigators have access to an Early Alert system that monitors student progress and allows for early interventions to promote student retention and completion. Navigators also provide additional support and can connect students to tutoring and other services designed to support student learning.

Criteria and Program Design

The State Board proposes that students demonstrate the ‘ability to benefit’ when they co-enroll in Title-IV federal aid eligible I-BEST programs and High School+. Highlights of this process are as follows:

- Students must qualify for federally supported levels of basic skills education. CASAS is used to appraise and pre-test all basic education students at the start of the program and post-test students following the [WA state Basic Skills Assessment Policy](#). Students may also demonstrate skill gain through the awarding of high school credits, as approved by OCTAE and outlined in the WA state Basic Skills Assessment Policy.
- Students must meet all entrance requirements to enroll in I-BEST. Each I-BEST program sets their own entrance requirements. Many use ABE 4/ESL 5 WIOA Federal Educational Functioning Level (EFLs) designations as a baseline, but this varies by program. Some may have additional math, writing, and other assessments designed to ensure that students are a good fit for the program.
- Students and programs must continue to meet all other ATB eligibility requirements.

Monitoring

Process Compliance

Washington state will monitor compliance of all Colleges who are approved for and implement the proposed state process on a quarterly basis. Each quarter, SBCTC will conduct a thorough desk audit of each approved college to ensure that all students enrolled in the ATB state process have met the requirements of co-enrollment in HS+ and I-BEST and are meeting eligibility requirements per federal guidelines and our process proposal. To accomplish this we will support all approved colleges in the collection and reporting of this information by leveraging our system of navigators. Navigators will track students on ATB and report quarterly to the SBCTC for verification that students on ATB meet requirements for eligibility. SBCTC data systems are set up to easily demonstrate which students are co-

enrolled in HS+ and I-BEST. A separate data system can produce a list of students enrolled in ATB by institution. The quarterly desk audit will check that institutions can demonstrate, for each student enrolled in ATB, the method of enrollment (achieved cut scores, the earning of six college credits, or co-enrollment in HS+ and I-BEST) as well as ensuring that all other ATB eligibility criteria are met. Institutions will continue to document that each ATB-enrolled student is enrolled in an eligible career pathway program, and that students are provided with the programming and supportive services mandated by the law. Institutions using the state-defined process will of course meet the same rigorous documentation requirements for all ATB students, regardless of each student's method of demonstrating ability to benefit.

Corrective Action & Termination

If a quarterly desk audit reveals that an institution has incorrectly placed one or more students on ability to benefit using the state-defined process, or are not meeting all of the requirements of the process then the institution will be placed on a corrective action plan. Colleges placed on a corrective action plan must demonstrate in the subsequent quarter that all students on ATB via the state-defined process have met the requirements of the process. SBCTC will provide both online and face-to-face training and technical support to ensure that the institution has the staffing, resources and processes in that place that are needed for successfully using the state-defined process per requirements in the proposal.

In order to fully implement the corrective action plan we request that the Department provide SBCTC with technical assistance on financial aid data systems. SBCTC is experiencing some challenges around reconciling the data for accuracy. This is partially due to Basic Education for Adults not having access to the Financial Aid Common Origination and Disbursement System (COD).

Student Success Rate

SBCTC has tracked the student success rate over the past three years as required by the Department of Education by 34 CFR § 668.156. We are pleased to report that we have met the requirements set by the rate. Please see The Ability to Benefit Research Brief in Attachment A of this application.

Part of SBCTC's support strategy for institutions using the state-defined process is to provide on-going training and technical assistance on strategies designed to increase success for students enrolled in ATB. An example of this is to integrate supports to students through the early alert systems in place across the system. In support of students, faculty submit alerts during the fourth week of the quarter for attendance concerns, academic progress concerns, or kudos. Students see a flag in their online student accounts. This flag also goes to the ATB advisor or navigator.

Questions

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RESEARCH BRIEF

AUGUST 3, 2023 | BRIEF NO. 23-1

ABILITY TO BENEFIT SUCCESS RATE

The Ability to Benefit Provision

Access to federal financial aid plays an important role in college affordability, can impact student enrollment factors at community or technical colleges (CTCs), and may improve the economic value of a college credential after graduationⁱⁱ. The federal Higher Education Act of 1965, as amended, allows a student without a high school diploma, or its recognized equivalent, to access such aid, provided the student is enrolled in an eligible career pathway program and is determined to have the “ability to benefit” from education or trainingⁱⁱⁱ.

This Ability to Benefit (ATB) provision prescribes three eligibility methods: 1) completing six college credits, 2) an exam approved by the US Department of Education (ED), or 3) an ED-approved state process. This research brief focuses on the latter method – the state process – and the requirements under the process to calculate a success rate of students eligible for federal aid under Washington’s state ATB plan^{iv}.

Success Rate Criteria

The state process requires each approved state to calculate a success rate comparing ATB students with their counterparts who have a high school diploma. Success is defined as those who 1) successfully completed their program, 2) remained enrolled at the end of the academic year, or 3) successfully transferred and remained enrolled at the end of the academic year. The students meeting these criteria are then divided by the total number of students who already have a high school diploma

enrolled at the participating colleges, subtracting those who received a 100 percent tuition refund after withdrawal or expulsion. The same success rate is calculated for students under the ATB state process. The success rate for ATB state process students must be within 95 percent of the success rate of their counterparts who have a high school diploma.

Washington’s Success Rate Criteria

To evaluate the success rate for Washington’s CTCs, Washington State Board for Community And Technical College (SBCTC) staff used post-census-date data from the [SBCTC Data Warehouse](#).

First, the following criteria were applied to find those who have a high school diploma (Diploma Group). To parse these students out, we limit the group to those who reported they had earned a high school diploma or higher. Not all students enrolled in Washington CTCs are seeking credentials over the course of several quarters, so the criteria for students in the success rate is limited to those in a program leading to a credential.

The intent of the ATB provision centers around access to financial aid, so further criteria were implemented to limit the Diploma Group to those who were eligible for federal financial aid, specifically Pell grants. The provision defines “success” as those completing, still enrolled, or transferring by the end of the academic year, so the Diploma Group is limited to the first three quarters of the academic year – summer, fall, and winter quarters.

Students meeting the completion criterion would have a college-level credential earned any time in the academic year. Those meeting the success criterion for continued enrollment would have an enrollment record as of the census date in spring quarter of the academic year (the end of the academic year), while those who transferred were found in the timeframe roughly translating to Washington CTCs' spring quarter in data matched to the National Student Clearinghouse.

Due to the timing of data availability, the success rate calculated for this brief is based on the 2021-22 academic year, the latest for which full academic year data is available. No factors for refunds for withdrawal or expulsion were necessary in this exercise because the SBCTC Data Warehouse only includes those enrolled as of the census date. In rare cases, certain exceptions may be made by colleges past this date, but those are likely controlled by the Pell eligibility criterion mentioned above (offered/accepted Pell grants, excluding grants that were cancelled or rejected).

Students enrolled at a CTC under the ATB state option (State Option Group) were enrolled in the first three quarters of the academic year and coded with a special student group code of SABS. Special consideration was made to ensure no students were included in both the Diploma Group and State Option Group.

Calculating Washington's Success Rate

A total of 28,165 students were captured in the Diploma Group. Note that, although Washington

CTCs enrolled over 260 thousand students in academic year 2021-22, the parameters mentioned above reduce this group to just over 28 thousand. 21,168 students in the system were found to be enrolled, completed, or transferred by the end of the year, resulting in a Diploma Group success rate of 75.2 percent.

With recent implementation, the State Option Group is comparatively small. Only 9 students enrolled under the state option in 2021-22. Eight of those students were found to have met the success criteria, a success rate of 88.9 percent. This rate is greater than the 95 percent threshold of the Diploma Group, meeting ED requirements.

Table 1. Success rates: Diploma Group and ATB State Option Group

	Diploma Group	ATB State Option Group
# in Group	28,165	9
# Meeting Success Criteria	21,168	8
Success Rate	75.2%	88.9%

The relative infancy of the WA state option for ATB and newly implemented coding to identify these students likely explains the low counts under this option, but participation in the state option appears to be increasing in 2022-23, with 20 students in the ATB State Option Group. The success rate for the 2022-23 academic year will be calculated once transfer and completion data are available.



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Except where otherwise noted

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