



SONYA CHRISTIAN
Chancellor

July 29, 2024

The Honorable Miguel Cardona
Secretary of Education
400 Maryland Ave SW
Washington, DC 20202

Dear Secretary Cardona,

Pursuant to 34 CFR 668.156, on behalf of the Board of Governors for the California Community Colleges and in close collaboration with the California Governor's Office, it is with great pleasure that I present this application for a California Ability-to-Benefit (ATB) alternative process.

The Chancellor's Office submitted an initial application on May 14th, 2024. Following the U.S. Department of Education's first review of our application and notification on June 28th, we are submitting an amended application with data to demonstrate that students admitted under the process without a high school diploma, or its equivalent have met the required student success rate as calculated under 668.156(h). The data is included in *Section 5. Student Success Rate Data and Reporting* of the amended application.

This initiative represents a significant step toward ensuring equitable access to higher education for all Californians. Our collective efforts aim to create a streamlined and inclusive pathway for individuals seeking to pursue their academic aspirations, regardless of their background or circumstances. Through this application, we aspire to empower individuals with diverse abilities and experiences to unlock their full potential and contribute meaningfully to our communities and society at large. We are excited about the transformative impact this endeavor will have on the educational landscape of our state and look forward to its successful implementation.

Sincerely,

A handwritten signature in black ink that reads 'Sonya Christian'.

Sonya Christian, Chancellor

Enclosure: Amended Application

Chancellor's Office

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California State Process for Ability to Benefit

Executive Summary

The California Ability-to-Benefit (ATB) alternative state process enables students who do not have a high school diploma (or the equivalent) to become eligible for Title IV financial aid. The ATB state process provides holistic support to students to successfully obtain a high school diploma and enter into or advance within a specific occupation (occupational cluster).

The California Community College Chancellors Office (Chancellor's Office) oversees the state's 116 community colleges that serve the largest and most diverse student body in higher education. Our system plays a pivotal role in shaping an equitable workforce, fostering social mobility and driving economic prosperity for the State.

Recent data indicates that California has the highest rate of adults aged 25 and above who do not have a high school diploma, which exceeds the national average by five percentage points. As the landscape of job opportunities increasingly demands some level of postsecondary education for a livable wage job, the absence of a secondary credential leaves roughly 4 million Californians stranded, far from the starting line of economic opportunity.

California has elevated both the Guided Pathways framework and dual enrollment as strategies to improve student success rates for all students, particularly low-income working adults. Within the Guided Pathways framework, California community colleges are structuring programs and support services to provide clearer, more defined paths from entry to completion of a credential or degree. Dual enrollment enables adults seeking a high school diploma or equivalent to concurrently pursue a postsecondary degree or certificate and is a cornerstone strategy for serving adult education learners within the guided pathways framework.

One crucial aspect of pathway development and dual enrollment is ensuring that students receive both the financial and academic support they need to be successful. This includes ensuring that students are eligible for financial aid. In California, many adults seeking high school and postsecondary credentials struggle to afford the first six college credits or encounter difficulties passing an ATB-approved exam after being out of school for an extended period. These challenges often render ATB inaccessible to numerous students who would indeed benefit from and succeed with federal student aid. The California ATB alternative state process will remove unnecessary barriers, allowing students to receive federal financial aid to help meet the total cost of college attendance while addressing their basic needs such housing and food.

California Ability-to-Benefit Process

The California ATB state process creates a pathway for students who do not possess a high school diploma (or the equivalent) to meet the academic eligibility requirements to receive federal financial aid. In accordance with 34 CFR 668.156, the process includes:

1. Student eligibility criteria to participate in the state-defined ATB process.
2. Required services that colleges will provide to ATB students.
3. Participating college requirements
4. Annual monitoring and supporting participating institutions.
5. Calculations and reporting requirements of the rate of success, as defined by the U.S. Department of Education
6. A list of California community colleges that will have an opportunity to take part in the California State ATB Process.

1. Student Eligibility Criteria

To be eligible to participate in the California ATB process, an adult student, beyond the age of 18 (per California's compulsory education law), must demonstrate the "ability to benefit" by meeting all the following criteria:

- Is pursuing a high school diploma or equivalency credential through an adult education high school diploma program or enrollment in a community college adult high school diploma program.
- Successfully completes a combination of assessment approaches as designated in the state process.
- Is enrolled in an [Eligible Career Pathway Program \(ECPP\) as defined by section 484\(d\)\(2\) of the HEA](#).
- Meets all [federal financial aid eligibility requirements](#).

2. Required Services

Services provided to ATB students by participating colleges includes, but not limited to:

- Orientation – Either in-person or online, is a critical component of Guided Pathways and is essential for an equitable and successful student experience. Orientation provides an opportunity for students to learn about on- and off-campus resources to meet both their shared and unique needs. During orientation, students will be provided with information regarding college policies and procedures including but not limited to:
 - Academic expectations and progress and probation standards.

- A description of available programs, support services, financial aid assistance and campus facilities, and how they can be accessed.
 - Academic calendar and important timelines.
 - Registration and college fees.
 - Available education planning services.
 - Other issues, policies and procedures the college determines as necessary to provide a comprehensive orientation to students.
- Financial aid assistance and basic needs support – Students will receive assistance with completing and submitting the FAFSA as well as an explanation of all available financial aid programs and their financial aid award offers. Students will also receive information about the college’s Satisfactory Academic Progress (SAP) and federal Return to Title IV (R2T4) policies. Students will have access to the college Basic Needs Centers to help address food and housing insecurity, transportation, technology, health and mental health, and childcare needs.
- Multiple Measures Assessment – Colleges will use multiple measures assessment to gain a more comprehensive view of a student's abilities, strengths and weaknesses compared to relying on a single test or assessment. This can include factors such as self-reported high school coursework, high school grades, high school grade point average, standardized test scores, essays, interviews, portfolios and extracurricular activities. This type of assessment allows colleges to consider the different learning styles, backgrounds and experiences of students and tailor their support, ensuring that all students have the opportunity to succeed.
- Educational goals – Every student participating in the ATB process will receive assistance in developing their educational goals. Using multiple measure assessment, career exploration and advising, students will be able to make informed education goals. Students will discover the career options, labor market trends, job outlooks, required skills and competencies, and educational requirements for various professions.
- Counseling – Every student participating in the ATB process will meet one-on-one with an academic counselor to develop education plans with clear pathways outlined in an educational plan. The educational plan will be developed to include the appropriate class level for that student given the student’s individual capabilities. Students will also have access to non-academic, specialized counseling to support specific student populations, such as veterans, foster youth, students with disabilities and first-generation college students. These services may include academic and personal counseling, advocacy and resources tailored to the unique needs of these populations.
- Academic Support: Throughout the student’s enrollment and on an ongoing basis, students will be provided tutoring in basic verbal and quantitative skills, when appropriate. In addition to classroom instruction, students may receive an array of academic support aimed at increasing their chances of success. Examples include:

- Other tutoring services
 - Writing and Math centers Study skills workshops
 - Library resources
 - Peer mentoring
 - Accessibility services
 - Online learning resources
 - Supplemental instruction
- Follow-up – All students will receive ongoing feedback by instructors and counselors regarding their academic progress and progress toward program completion. Students will receive follow-up evaluations of their classroom performance and progress toward their educational and career objectives through academic advising, student support services and processes such as the early alert system, which should be available at every campus. Follow-up services are administered by faculty, counselors and advisors possessing the requisite skills and experience to deliver such support.

3. Participating College Requirements

Participating California community colleges must demonstrate how the Eligible Career Pathway Programs (ECP) meet all the following criteria:

1. Combine rigorous and high-quality education and training.
 2. Align with the skill needs of industries in the economy of the state or regional economy involve.
 3. Prepare an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeships
 4. Include counseling to support an individual in achieving the individual's education and career goals.
 5. Include, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster.
 6. Organize education, training and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable.
 7. Enable an individual to attain a high school diploma or its recognized equivalent, and at least one recognized postsecondary credential.
 8. Help an individual enter or advance within a specific occupation or occupational cluster.
- Maintain a success rate that is within 95% of the success rate of students with high school diplomas.
 - Develop and implement a process for monitoring, verifying and reporting that ATB students:

- Have utilized one of the three approved methods for ATB eligibility as designated by the U.S. Department of Education (e.g., passing an approved exam, completing 6 credit hours, participating in the approved state process) to qualify for federal financial aid.
- Are enrolled in adult education and postsecondary education. Concurrent enrollment is not mandatory.
- Submit all required reports to the Chancellor's Office.

4. Monitoring

The Chancellor's Office will monitor on an annual basis each participating college for compliance with state process requirements. Each participating college will agree to adhere to the state-defined process requirements. Institutions failing to fulfill any of the mandatory components will be notified and may be placed on a corrective action plan outlining their strategy to meet all participation requirements. Institutions failing to meet the regulatory requirement to maintain a success rate that is within 95% of the success rate of students with a high school diploma will be subject to the below corrective action and termination steps.

Corrective Action

Institutions with a rate of 90% to 94%:

- Will be added to a "watch list" for one year.
- After one year, if the success rate meets the regulatory mandate, the institution will be removed from the watch list and deemed in good standing.
- After one year, if the success rate is still below the regulatory mandate, they must submit a corrective action plan. Specifically, the plan should include a root cause analysis, action steps, to increase the success rate, a timeline for implementing the corrective actions steps, resources needed, monitoring and evaluation plan, and continuous improvement and sustainability plan.

Institutions with a rate below 90%:

- Must submit a corrective action plan. The plan must include the college's plan to address and increase their success rate. Specifically, the plan should include a root cause analysis, action steps, to increase the success rate, a timeline for implementing the corrective actions steps, resources needed, monitoring and evaluation plan, and continuous improvement and sustainability plan.

Termination

Should an institution be on a corrective action plan for three consecutive years, it will be terminated from participation in the state process if it does not meet the required success rate following the end of the third year. Institutions will receive a 90-day notification of termination. Upon notification, institutions will be prohibited from enrolling new students. However, they must continue to support mid-program ATB students until they become eligible through the other ATB alternatives – either passing an independently administered ATB test or have completed at least six units applicable to a Title IV eligible degree or certificate.

5. Student Success Rate Data and Reporting

Participating colleges will be required to annually submit all necessary data to calculate the success rate of students. The primary source of data collected from colleges is through the submission of student-level data to the Chancellor's Office Management Information System (MIS). MIS data elements will be used to demonstrate student success defined as persistence, completion of a credential or transfer at a rate of 95% or higher for students participating in the state defined ATB process compared to community colleges students with a high school diploma.

The Chancellor's Office will calculate the success rates for participating students by:

- Determining the number of students with high school diplomas who, during the applicable award year, enrolled in participating institutions and—
- Successfully completed education or training programs;
- Remained enrolled in education or training programs at the end of that award year; or
- Successfully transferred to and remained enrolled in another institution at the end of that award year.
- Determining the number of students with high school diplomas who enrolled in education or training programs in participating institutions during that award year.
- Determining the number of students calculated in (2) of this section who remained enrolled after subtracting the number of students who subsequently withdrew or were expelled from participating institutions and received a 100% refund of their tuition under the institutions' refund policies.
- Dividing the number of students determined in (1) of this section by the number of students determined in (3) of this section.
- Making the calculations described in (1) through (4) of this section for students without a high school diploma or its recognized equivalent who enrolled in participating institutions.

The Chancellor's Office has calculated systemwide success rates, using currently available data from our MIS to compare outcomes of students with and without a high school diploma or equivalent, participating in a career and technical education program, and receiving comparable support services to an ATB state process. These supports include counseling to complete an education plan and participation in an orientation. The Chancellor's Office only collects data from colleges for students who were enrolled as of the census date. Students who withdrew from courses prior to census and were eligible for a tuition refund are not included in the data analysis.

Our systemwide analysis using 2022-2023 academic year data finds that students without a high school diploma or equivalent achieve success at a 96% rate compared to that of students with a high school diploma. This rate exceeds the 95% required for approval of a state process.

Our calculation using is determined as follows:

Students with a high school diploma calculation

Step 1

Calculation	Number of Students
Determine the number of students with high school diplomas or its recognized equivalent who enrolled in the same title IV eligible programs (eligible program) as students without high school diplomas (or its recognized equivalent) participating in the State Process	357,574

Step 2

Calculation	Number of Students
Determine the number of students with high school diplomas or equivalent who enrolled in the same eligible programs as students participating the States process and: 1) Successfully completed the eligible programs; 2) Remained enrolled in the eligible programs at the end of the award year; or 3) Successfully transferred to and remained enrolled in another institution at the end of the award year.	313,396

Step 3

Calculation	Number of Students
Result from Step 2	313,396
Result from Step 1	357,574
Step 2/Step1 (Success Rate)	88%

Students without a high school diploma calculation

Step 1

Calculation	Number of Students
Determine the number of students without a high school diploma or its recognized equivalent who enrolled in eligible programs through the State process	2,868

Step 2

Calculation	Number of Students
Determine the number of students without a high school diploma or its recognized equivalent who enrolled through the State process and: 1) Successfully completed the eligible programs; 2) Remained enrolled in the eligible programs at the end of the award year; or 3) Successfully transferred to and remained enrolled in another institution at the end of the award year.	2,412

Step 3

Calculation	Number of Students
Result from Step 2	2,412
Result from Step 1	2,868
Step 2/Step1 (Success Rate)	84%

Overall calculation

Calculation	Success Rates
Success Rate for students without a high school diploma	84%
Success Rate for students with a high school diploma	88%
Overall success rate	96%

6. Potential Participating Institutions

The following community colleges may participate in California ATB process:

College Name	Contact Name	Title
Allan Hancock College	Genevieve Siwabessy	Vice President, Student Services
American River College	Nicole Porter	Interim Vice President, Student Services
Antelope Valley College	Idania Reyes	Assistant Vice President, Student Services
Bakersfield College	Imelda Simos-Valdez	Interim Vice President, Student Affairs
Barstow College	Oscar Espinoza-Parra	Vice President, Student Services
Berkeley City College	Stacey Shears	Vice President, Student Services
Butte College	Brad Zuniga	Interim Vice President, Student Services
Cabrillo College	Amy Lehman-Sexton	Vice President, Student Services
Calbright College	Don Orth	Vice President of Student Services & Success
Cañada College	Manuel Pérez	Vice President, Student Services
Cerritos College	Robyn Brammer	Vice President, Student Services
Cerro Coso Community College	Heather Ostash	Vice President, Student Services
Chabot College	Matthew Kritscher	Vice President, Student Services
Chaffey College	Alisha Rosas	Associate Superintendent, Student Services
Citrus College	Dr. Richard Rams	Vice President, Student Services
City College of San Francisco	Lisa Cooper-Wilkins	Vice Chancellor, Student Affairs
Clovis Community College	Marco De La Garza	Vice President, Student Services
Coalinga College	Angela Tos	Vice President, Student Services
Coastline Community College	Dr. Kate Mueller	Vice President, Student Services

College of Alameda	Dr. Mildred Lewis	Interim Vice President, Student Services
College of Marin	Jonathon Eldridge	Vice President, Student Services
College of San Mateo	Alex Guiriba	Interim Vice President, Student Services
College of the Canyons	Dr. Jasmine Ruys	Vice President, Student Services
College of the Desert	Jeff Baker	Vice President, Student Services
College of the Redwoods	Dr. Crystal Morse	Associate Vice President, Office of Student Success
College of the Sequoias	Jessica Morrison	Vice President, Student Services
College of the Siskiyous	Patrick Walton	Vice President, Student Services
Columbia College	Dr. Melissa Raby	Vice President, Student Services
Compton College	Nicole Jones	Vice President, Student Services
Contra Costa College	Kenyetta Tribble	Acting Vice President, Academic & Student Affairs
Copper Mountain College	Jane Kwon	Vice President, Student Services
Cosumnes River College	Theresa Tena	Vice President, Administrative Services and Student Support
Crafton Hills College	Delmy Montenegro-Spencer	Vice President, Student Services
Cuesta College	Elizabeth Coria	Vice Superintendent/VP, Student Services & College Centers
Cuyamaca College	Bri Hays	Interim Vice President, Student Services
Cypress College	Paul de Dios	Vice President, Student Services
De Anza College	Rob Mieso	Vice President, Student Services
Diablo Valley College	Vicki Ferguson	Vice President, Student Services
East Los Angeles College	Miguel Duenas	Vice President, Student Services
El Camino College	Jeff Stephenson	Vice President, Student Services
Evergreen Valley College	Howard Willis	Vice President, Student Affairs
Feather River College	Carlie McCarthy	Chief Student Services Officer
Folsom Lake College	Kellie Butler	Vice President, Student Services
Foothill College	Laurie Scolari	Vice President, Student Services
Fresno City College	Lataria Hall	Vice President, Student Services
Fullerton College	Gilbert Contreras	Vice President, Student Services
Gavilan College	Renee Craig-Marius	Assistant Superintendent/Vice President of Student Services
Glendale Community College	Paul Schlossman	Vice President, Student Services
Golden West College	Claudia Lee	Vice President, Student Services
Grossmont College	Marsha Gable	Vice President, Student Services
Hartnell College	Romero Jalomo	Vice President, Student Affairs
Imperial Valley College	Lorena Lopez	Vice President, Student Services & Equity
Irvine Valley College	Martha McDonald	Vice President, Student Services

Lake Tahoe Community College	Michelle Batista	Vice President, Student Services
Laney College	Marlon Hall	Vice President of Student Services & Title IX Coordinator
Las Positas College	Jeanne Wilson	Vice President, Student Services
Lassen College	Roxanna Haynes	Interim VP, Student Services
Lemoore College	Garcia Val	Vice President, Student Services
Long Beach City College	Nohel Corral	Interim Vice President, Student Support Services
Los Angeles City College	Alen Andriassian	Vice President, Student Services
Los Angeles Harbor College	Vacant Vacant	Vice President, Student Services
Los Angeles Mission College	Larry Resendez	Vice President, Student Services
Los Angeles Pierce College	Jason Cifra	Vice President, Student Services
Los Angeles Southwest College	Tangelia Alfred	Acting Vice President, Student Services
Los Angeles Trade-Tech College	Dr. Henan Joof	Interim Vice President, Student Services
Los Angeles Valley College	Florentino Manzano	Vice President, Student Services
Los Medanos College	Tanisha Maxwell	Vice President, Student Services
Madera Community College	Marie Harris	Vice President, Learning & Student Success
Mendocino College	Ulises Velasco	Vice President, Student Services
Merced College	Michael McCandless	Vice President, Student Services
Merritt College	Lilia Chavez	Vice President, Student Services
MiraCosta Community College	Alketa Wojcik	Vice President, Student Services
Mission College	Omar Murillo	Interim Vice President, Student Services
Modesto Junior College	Andrea Wilson	Vice President, Student Services
Monterey Peninsula College	Larry Walker	Vice President, Student Services
Moorpark College	Dr. Khushnur Dadabhoy	Vice President, Student Services
Moreno Valley College	Corey Rodgers	Interim Vice President, Student Services
Mt. San Antonio College	Dr. Melba Castro	Vice President, Student Services
Mt. San Jacinto College	Rebecca Teague	Interim Vice President, Student Services
Napa Valley College	Alejandro Guerrero	Associate Vice President, Student Affairs
Norco College	Kaneesha Tarrant	Vice President, Student Services
Ohlone College	Lizette Bricker	Vice President, Student Services
Orange Coast College	Madjid Niroumand	Vice President, Student Services
Oxnard College	Leah Alarcon	Acting Vice President, Student Development

Palo Verde College	Clint Cowden	Interim Vice President, Instruction & Student Services
Palomar College	Nick Mata	Assistant Superintendent, Student Services
Pasadena City College	Brenda Ivelisse	Vice President, Student Services
Porterville College	Premavera Arvizu	Vice President, Student Services
Reedley College	Natalie Culver-Dockins	Interim Vice President, Student Services
Rio Hondo College	Earic Dixon-Peters	Vice President, Student and Community Services
Riverside City College	FeRita Carter	Vice President, Student Services
Sacramento City College	Davin Brown	Vice President, Student Services
Saddleback College	Jennifer LaBounty	Vice President, Student Services
San Bernardino Valley College	Olivia Rosas	Interim Vice President, Student Services
San Diego City College	Marciano Pérez	Vice President, Student Services
San Diego Mesa College	Larry Maxey	Acting Vice President, Student Services
San Diego Miramar College	Adrain Gonzales	Vice President, Student Services
San Joaquin Delta College	Lonita Cordova	Assistant Superintendent of Student Services
San Jose City College	William Garcia	Vice President, Student Affairs
Santa Ana College	Vaniethia Hubbard	Vice President, Student Services
Santa Barbara City College	Paloma Arnold	Executive Vice President, Educational Programs
Santa Monica College	Michael Tuitasi	Vice President, Student Services
Santa Rosa Junior College	Robert Ethington	Interim Vice President, Student Services
Santiago Canyon College	Christopher Sweeten	Vice President, Student Services
Shasta College	Timothy Johnston	Associate Vice President, Student Services
Sierra College	Lucas Moosman	Interim Vice President of Student Services
Skyline College	Luis Escobar	Acting Vice President, Student Services
Solano Community College	Lisa Neeley	Vice President, Student Services
Southwestern College	Rachel Fischer	Vice President, Student Affairs
Taft College	Damon Bell	Vice President, Student Services
Ventura College	JP Schumacher	Vice President, Student Affairs
Victor Valley College	Karen Engelsen	Vice President, Student Services
West Los Angeles College	Roberto Gonzalez	Vice President, Student Services
West Valley College	Renee Kazemipour Paquier	Vice President, Student Services
Woodland Community College	Ariana Velasco	Vice President, Student Services
Yuba College	Tonia Teresh	Vice President, Student Services

Contact Information

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