ABILITY TO BENEFIT ELIGIBLE CAREER PATHWAY PROGRAM DOCUMENTATION CHECKLIST

OVERVIEW

In June 2024, the U.S. Department of Education's *Dear Colleague Letter on Ability to Benefit State Process and Eligible Career Pathway Programs* (GEN-24-08) introduced new regulatory guidance for eligible career pathway programs (ECPPs). Starting on January 1, 2025, any institution using Ability to Benefit (ATB) must upload documentation using the Electronic Eligibility Application (E-App) to demonstrate that one of its ATB Career Pathway Programs (CPPs) meets these new ECPP requirements. Institutions must also provide a list of their other ATB CPPs and certify that they all meet the same requirements.

This resource is based on the table of regulation requirements and non-exhaustive acceptable documentation examples presented in GEN-24-08. In addition, it includes the following:

- Other examples of acceptable documentation, and spaces for states and institutions to list their own
- A column for institutions to note who to contact in order to locate the relevant documentation

This checklist is intended as an internal resource for ATB implementation teams at institutions. It does not fulfill any ECPP documentation requirements, and it does not need to be uploaded into the E-App alongside the required documentation.

OTHER GUIDANCE

- For a complete set of ECPP documentation that has been approved by the U.S. Department of Education, refer to Pima Community College's IT Support Technician I-BEST program documentation.
- Each piece of ECPP documentation should be uploaded in the E-App as a separate PDF. Financial aid offices should consult their Federal Student Aid eligibility analyst for instructions on file-naming.

This resource was originally produced as part of Communities for Advancing ATB, a project of World Education's National College Transition Network, and was last updated in September 2026. World Education thanks the national ATB learning community, a collaboration with the Minnesota State Colleges and Universities system, for their contributions during the development of this checklist.

34 CFR 668.157 – ECPP	REQUIREMENT IN REGULATION	NON-EXHAUSTIVE ACCEPTABLE DOCUMENTATION EXAMPLES	ADDITIONAL DOCUMENTATION EXAMPLES	WHO TO CONTACT FOR DOCUMENTATION
(a)	An institution demonstrates to the Secretary that a student is enrolled in an eligible career pathway program by documenting that—	N/A	N/A	N/A
(a)(1)	The student has enrolled in or is receiving all three of the following elements simultaneously—	N/A	N/A	N/A
(a)(1)(i) ☐	An eligible postsecondary program as defined in § 668.8	Document that all CPPs meet the eligible program standards in 34 CFR 668.8. Additional information can be found in Volume 2 of the FSA Handbook.	• Your program of study documentation • •	

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(a)(1)(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.	1. Document that the program offers at least one of the activities listed in paragraphs (a) or (h) of 34 CFR 463.30 and provide a description of how it offers the activity. (Two pages or less); or 2. Provide a funded application from the most recent competitive WIOA Title II Competition.	• Narrative (two pages or less) demonstrating that the program includes Adult Education and Family Literacy Act (AEFLA) activities *OR* • Your AEFLA award documentation • •	

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(a)(1)(iii) ☐	Workforce preparation activities as described in 34 CFR § 463.34.	Document how the CPP will help a participant acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills. For examples see 34 CFR 463.34. (Two pages or less)
		
		This may also include:
		
		1. Employability skills that address competencies in using resources and information, working with others, understanding systems, and obtaining skills necessary to successfully transition to and complete postsecondary education, training, and employment; or
		
		2. Other employability skills that increase an individual's preparation for the workforce.
			• Narrative (two pages or less) demonstrating that the program includes workforce preparation activities, with sources such as:
			  • Your state or local employability skills standards
			  • The U.S. Department of Education's Employability Skills Framework
			  • Your state's digital skills or digital literacy framework
			•	

(a)(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—	N/A	N/A	N/A

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(a)(2)(i) ☐	Government reports identifying in-demand occupations in the State or regional labor market	1. A relevant report by a Federal agency completed within 5 years of initiating the CPP; 2. A report completed by the mayor's office or a public council/board; 3. A report from the Local Workforce Development Board; 4. The Economic, Workforce, and Workforce Development Activities Analysis section from the most recent unified or combined WIOA State Plan; 4 [*sic*]. Economic and labor market data report from the State Department of Labor, State Workforce Development Board, or Local Workforce Development Board (or equivalents); or 5. A published document or certified report from the State's Department of Labor (or equivalent) establishing the in-demand occupations in the State or regional labor market.	• Government report identifying demand for the skills or credentials offered by the program (e.g., state WIOA or Perkins plans), a federal report not more than 5 years old, or a Local Workforce Development Board report • • •	

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(a)(2)(ii) ☐	Surveys, interviews, meetings, or other information obtained by the institution regarding the hiring needs of employers in the State or regional labor market	1. Completed surveys sent out to by the institution to at least 10 State or regional employers noting hiring needs; 2. Documented interviews conducted by the institution with at least five State or regional employers noting hiring needs; 3. Meeting minutes between the institution and State or regional employers noting hiring need; or 4. Employer Needs Survey from the State Workforce Development Board.	• Institutional information documenting the need to hire people with the skills or credentials offered by the program (e.g., advisory board meeting minutes; institutional strategic planning documents) • •	

(a)(2)(iii) ☐	Documentation that demonstrates direct engagement with industry	1. Meeting minutes from local and/or State Workforce Development Boards demonstrating engagement with industry; or
		
		2. Feedback from an industry advisory committee indicating the institution's engagement.
			• Demonstrated direct engagement with industry through
			  • Meeting minutes from Local/State Workforce Development Boards
			  OR
			  • Feedback from an industry advisory committee (e.g., program of study advisory council)	

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(a)(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	Demonstrate through narrative documentation that coursework and/or training and the credential the student will receive upon graduation from the CPP align with the skill needs of industries in the State and regional labor market. (Two pages or less)	• Narrative (two pages or less) demonstrating that the program coursework and/or training and the program credential align with the skill needs of state and regional industries (e.g., the program syllabus) •	
(a)(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	Document what career counseling service(s) will be provided to students enrolled in CPPs. (Two pages or less)	• Narrative (two pages or less) documenting the career counseling service(s) provided to students in this program • •	

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(a)(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 education is aligned with the students' career objectives	1. Agreement, memorandum of understanding, or other documentation between the institution and the adult education agency or provider; or 2. Documentation that the ECPP is offered as part of an Integrated Education and Training Program (IET).	• Your agreement or other documentation between you and the adult education provider *OR* • Documentation that the program is part of an Integrated Education and Training Program (e.g., your state's list of approved IETs) • •	

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(a)(6) ☐	The program is designed to lead to a valid high school diploma as defined in § 668.16(p) or its recognized equivalent.	Document the secondary component of the CPP. The "recognized equivalent of a high school diploma" is located in 34 CFR 600.2. The procedures to evaluate the validity of a HS diploma are in 34 CFR 668.16(p). It should be noted that although the secondary component is required in order for the program to be eligible as an ATB ECPP, the hours, credits or work in the secondary component is not eligible for Federal student aid. That component cannot be included in determining the length of the postsecondary program, the student's *Title IV* enrollment status, or the cost of attendance.	• Documentation that the program includes a state-approved high school diploma or equivalent • •	
N/A ☐	If the institution intends to enroll students via a state-defined process, it must submit a copy of the state process application in addition to the documentation listed above.			