



Virginia State Process *for Ability to Benefit*

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Executive Summary

The Virginia Ability to Benefit (ATB) State process enables students who do not have a high school diploma (or the equivalent) to become eligible for Title IV financial aid if enrolled in an Eligible Career Pathway Program (ECPP). The ATB state process provides holistic support to students to successfully obtain a high school diploma or equivalent and enter into or advance within a specific occupation (occupational cluster). This process is approved by the U.S. Department of Education and administered by the Virginia Community College System (the VCCS) in partnership with participating institutions, ensuring compliance with federal regulations under 34 CFR § 668.156 for approved State processes that establish student eligibility for Title IV financial aid.

Since 1966, Virginia's Community Colleges have given everyone the opportunity to learn and develop the right skills, so lives and communities are strengthened. By making higher education and workforce training available in every part of Virginia, we elevate all of Virginia. In the academic year 2024, Virginia's Community College System served more than 232,000 students. The VCCS, governed by the State Board and led by Chancellor David Doré, is comprised of 23 community colleges with 40 campus locations across the Commonwealth that serve a large and diverse student body. Through this structured governance framework, the VCCS continues to provide high-quality education and training, empowering students and communities throughout the state. Eleven of Virginia's community colleges are in the top 200, eligible for the 2027 Aspen Prize for Community College Excellence.

American Community Survey (ACS) 2019–2023 five-year estimates indicate that approximately 8.7 percent of Virginians aged 25 through 64 lack a high school diploma or equivalent, representing a significant population for whom the absence of a secondary credential remains a primary barrier to accessing postsecondary education and federal financial aid. Virginia's Community College System serves as a critical postsecondary access point for these adults as they transition from foundational skills development and workforce preparation into credit-bearing programs.

In Academic Year 2025, the VCCS enrolled 51,408 adult students in credit-bearing degrees and certificates and 15,043 adults in FastForward workforce noncredit programs. FastForward students, one of the intended audiences for ATB Pell, reflect the population targeted by ATB, 90 percent of whom are first-time VCCS students. FastForward program outcomes demonstrate strong effectiveness, with 95 percent of students completing training, 75 percent earning third-party validated industry

credentials, and 75 percent employed within six months of completion. More than half of FastForward programs stack into credit-bearing degrees or certificates, with most offering credit for prior learning.

VCCS has created meaningful career pathways, aligning workforce credentials with academic programs to ensure transferability and credit for prior learning. This accelerates students' completion of academic/credit programs, making them more employable and readying them for the workforce more quickly. In addition to career coaching and advising, all students have access to wrap-around services to address academic and non-academic barriers to success. The VCCS has strong partnerships with adult education and the Virginia Adult Learning Resource Center, with demonstrated successes providing dual enrollment for adult learners through PluggedIn Virginia initiatives, integrated education and training, bridge programs, SNAP Employment and Training, and FastForward industry-recognized credentials. VCCS also has growing programs in carceral facilities offering FastForward, CTE/ Postsecondary Perkins, and transfer programs through state and federal prisons, jails, and detention centers in Virginia, preparing the future workforce for the increasing job opportunities within the Commonwealth.

The potential for an ATB State process represents a transformative opportunity for Virginia's adult learners. By establishing flexibility for students without a high school diploma or equivalent to access credit-bearing career pathways courses and Title IV financial aid, Virginia is removing critical barriers to postsecondary education and career advancement. Virginia is exceptionally well-positioned to implement this process thanks to a robust pipeline of adult education programs already in place. These innovative models have proven successful in supporting adult learners as they transition to postsecondary education and workforce credentials. Examples include integrated education and training (IET), which combines adult education, workforce training toward industry-recognized credentials, and career readiness; bridge programming with adult education, college-level coursework and wraparound support; and FastForward accelerated pathways which enable learners to earn stackable postsecondary industry-recognized credentials quickly and efficiently. Career pathways courses are created and improved using real-time labor market data and with the expert guidance of advisory committees comprised of business and industry professionals in their fields. Credentials, content, equipment, and experiential learning are directly influenced by real-world demand. Adult learners with postsecondary education are seeing 1.5 times higher earnings with a 30 percent expected increase in enrollment for this population with access to financial aid.

Section I: Virginia Ability to Benefit Process Overview

The Virginia ATB State process creates a pathway for students who do not possess a high school diploma or equivalent to meet the financial and academic eligibility requirements to receive federal financial aid if enrolled in an Eligible Career Pathway Program (ECPP). In accordance with 34 CFR 668.156, the process includes:

1. Student eligibility criteria to participate in the State 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 Virginia community colleges that will have an opportunity to take part in the State ATB Process.

Section II: Potential Participating Institutions

The two colleges in bold are in the process of developing Eligible Career Pathway Program applications to submit this year and the remaining community colleges will submit ECPP applications at a later date, if they choose to participate in the Virginia ATB State process once approved.

- Blue Ridge Community College
- Brightpoint Community College
- Camp Community College
- Central Virginia Community College
- Danville Community College
- **Eastern Shore Community College**
- Germanna Community College
- Laurel Ridge Community College
- Mountain Empire Community College
- Mountain Gateway Community College
- New River Community College
- Northern Virginia Community College
- Patrick & Henry Community College
- Piedmont Virginia Community College
- Rappahannock Community College
- Reynolds Community College
- Southside Virginia Community College
- Southwest Virginia Community College
- Tidewater Community College
- Virginia Highlands Community College
- Virginia Peninsula Community College
- **Virginia Western Community College**
- Wytheville Community College

Section III: Requirements of Participating Institutions

Virginia's community colleges will adhere to the requirements of § 668.157 Eligible Career Pathway Program (ECPP), which includes enrollment in an eligible postsecondary program, co-enrollment in an adult education program, and participation in workforce preparation activities. The Virginia Community College System will develop a policy, approved by the State Board for Community Colleges, which outlines college participation with Ability to Benefit and ECPP requirements.

Participating Virginia community colleges will demonstrate how the ECPP 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, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster.
5. 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.
6. Enable an individual to attain a high school diploma or equivalent, and at least one recognized postsecondary credential.
7. Help an individual enter or advance within a specific occupation or occupational cluster.
8. Maintain a success rate that is within 85% of the success rate of students with high school diplomas.

9. 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 VCCS.

10. Include counseling to support an individual in achieving the individual's education and career goals. Services provided to ATB students by participating colleges include, but are not limited to:

Orientation: Offered in-person and online, new student orientation 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 understanding all available financial aid programs and their financial aid award packages. Students will also receive information about the college's Satisfactory Academic Progress (SAP), federal Return to Title IV (R2T4) policies, and Ability to Benefit.

Non-academic resources and support: Students will access *Single Stop* (an online screening tool) to help address food and housing insecurity, transportation, technology, health and mental health, childcare needs, financial emergencies, employment assistance, utility and food/nutrition needs, legal counseling, and many other services. More than 90% of VCCS students receive benefits after utilizing *Single Stop*.

Educational goal development: Every student participating in the ATB process will receive assistance in developing their educational goals. Advisors, navigators, career coaches, student success coaches, and tutors will support, encourage and empower students to achieve their personal, academic and career goals by identifying and accessing on and off campus resources. Using multiple measure assessment, career exploration and advising, students will be able to make informed educational goals. All students will have access to *EAB Navigate*, an interactive student experience platform integrated with SIS. *Navigate Student* allows students to find their program/career path, know important to-dos and deadlines, schedule an appointment with an advisor, create an academic plan, register for class, raise their hand to alert staff of concerns or needs, and connect with study buddies. Students will discover career options, labor market trends, job outlooks, required skills and competencies, and educational requirements for various professions.

Academic advising and counseling: Every student participating in the ATB process will meet one-on-one with an academic advisor to develop educational plans with clear pathways. A review of any industry-recognized credential(s), work and life experiences, and other past education and training to determine eligibility for Credit for Prior Learning (CPL) will be completed during the academic advising session through the use of a defined VCCS process and www.Credits2Careers.org. The educational plan will be developed to include the appropriate class level for that student given the student's individual capabilities, ensuring a pathway to successful completion of program curriculum requirements. Students will also have access to non-academic, specialized counseling to address and support a student's broader personal, social, and emotional needs that might be impacting their academic performance. Such support is available to 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 and retention 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 persistence, retention and success. Examples include goal setting, assistance applying for financial aid and scholarships, 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 advisors regarding their academic journey 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.

Section IV: Student Eligibility Criteria

To be eligible to participate in the Virginia ATB State process, an adult student, beyond the age of 18 (per Virginia’s compulsory education law), must demonstrate the “ability to benefit” by meeting the four following criteria:

1. Is pursuing a high school diploma or equivalency credential through an adult education program or enrollment in a high school diploma program for adults.
2. Demonstrates postsecondary readiness by:
 - Enrolling in an integrated education and training (IET) cohort or a bridge to postsecondary course through an adult education program; OR
 - Accruing six credits as assessed through Credit for Prior Learning (CPL) as documented by the VCCS process and www.Credits2Careers.org; OR
 - Attaining an industry-recognized credential that is eligible for credit for prior learning at a Virginia community college.
3. Is enrolled in an Eligible Career Pathway Program (ECP) as defined by section 484(d)(2) of the Higher Education Act.
4. Meets all federal financial aid eligibility requirements.

Section V: Success Rate

For purposes of the Virginia ATB State process, student success is defined in accordance with 34 CFR § 668.156 as any of the following outcomes during the applicable award year:

- Completion of the eligible education or training program;
- Continued enrollment in the eligible program at the end of the award year; or
- Transfer to another institution and continued enrollment at the end of the award year. Success rates for students participating in the ATB State process will be compared to success rates for students with a high school diploma or equivalent who are enrolled in comparable Title IV-eligible programs and receiving comparable supports. Consistent with federal regulation, the success rate for ATB students must be at least 85 percent of the success rate for students with a high school diploma or equivalent.

Success rate calculation methodology: The VCCS Office of Research and Reporting will calculate success rates centrally using student-level data extracted from the VCCS Student Information System (SIS), applying uniform inclusion and exclusion rules across all participating institutions.

The success rate calculation will be conducted as follows:

1. Determine the number of students with a high school diploma or equivalent who, during the applicable award year, enrolled in participating institutions in the same eligible programs as ATB students and who:
 - a. Successfully completed an education or training program;
 - b. Remained enrolled in an education or training program at the end of the award year; or
 - c. Successfully transferred to and remained enrolled in another institution at the end of the award year.
2. Determine the total number of students with a high school diploma or equivalent who enrolled in the same eligible programs at participating institutions during the applicable award year.
3. From the population identified in Step 2, subtract students who withdrew or were expelled prior to the census date and received a 100 percent tuition refund, in accordance with institutional refund policies.

4. Divide the number of students identified in Step 1 by the adjusted number of students identified in Step 3 to calculate the success rate for students with a high school diploma or equivalent.
5. Apply the same methodology described in Steps 1 through 4 to students without a high school diploma or equivalent who enrolled in eligible programs through the ATB State process.

All calculations are based on official SIS enrollment and completion records. Students who withdraw prior to the census date and are eligible for a tuition refund are excluded from reported cohorts, consistent with standard VCCS reporting practices and ED evaluation standards.

Ongoing monitoring and evaluation commitment: Following approval of the ATB State process, the VCCS commits to annual calculation, evaluation, and reporting of ATB student success rates, centralized at the system level, to ensure that outcomes for ATB students meet the 85 percent comparability threshold required under federal regulation. If results indicate that the threshold is not met, the VCCS will implement appropriate corrective actions as referenced below, including technical assistance to participating colleges and adjustments to program design or student supports, consistent with ED guidance for approved State processes.

Section VI: Data Collection and Reporting

The VCCS has established and sustained capacity to collect, manage, and analyze student-level data necessary to support evaluation of the ATB State process. The VCCS relies on a single, statewide Student Information System (SIS) as the official system of record for all 23 community colleges, enabling consistent identification of student populations, standardized reporting, longitudinal tracking across institutions, and audit readiness.

Participating colleges currently use SIS-based student attributes and group coding to identify and track specific student populations for reporting, monitoring, and compliance purposes. For the ATB State process, colleges will continue this established practice by identifying participating students through a designated ATB student group within the SIS. Colleges will not submit separate ATB data reports. This approach reflects existing operational practice and ensures consistent, systemwide identification of ATB students.

Using student-level data maintained in the SIS, the VCCS routinely conducts systemwide analyses of student outcomes, including term-to-term retention, year-

over-year persistence, and credential completion or graduation, at both the system and college levels. These analyses are regularly disaggregated by program type, degree and major, Pell eligibility, enrollment intensity, and other academic and demographic characteristics. Results are routinely shared with colleges and used to support advising strategies, program management, performance review, and continuous improvement.

In addition, the VCCS regularly tracks workforce-to-credit transitions, including FastForward workforce students who subsequently enroll in credit-bearing degree and certificate programs. The VCCS also conducts ongoing data matching with WIOA Title II Adult Education programs to track adult education participants as they transition into FastForward workforce programs and credit-bearing degree and certificate programs and to monitor persistence, completion, and graduation outcomes following entry into postsecondary education and training pathways. These practices demonstrate the system's experience in tracking student progression across education and workforce systems relevant to the ATB population.

Student outcome analyses conducted by the VCCS are based on official SIS enrollment and completion records and apply established inclusion and exclusion rules tied to census reporting. Students who withdraw prior to the census date and are eligible for a tuition refund under institutional refund policies are excluded from reported cohorts, consistent with longstanding VCCS reporting practice and ED evaluation standards.

The same SIS-based infrastructure, data governance practices, and centralized analytic processes currently used by the VCCS will be used and sustained to support ATB-related data collection, reporting, and evaluation. This ensures that ATB success-rate calculations and ongoing monitoring will be conducted using proven systems, established methodologies, and existing institutional capacity, consistent with ED expectations for approved ATB State processes.

Section VII: 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. The institution will receive guidance and assistance from the System Office and other participating colleges for program improvement.

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. The institution will receive guidance and assistance from the System Office and other participating colleges for program improvement.

Section VII: Termination Clause

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 using the State process. 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.

Certifications

Virginia certifies that all career pathway programs (CPPs) intended for use through the State process constitutes an "eligible career pathway program" as defined in § 668.2 and as documented pursuant to § 668.157.

The Commonwealth of Virginia certifies that not more than 33 percent of each participating institution's undergraduate regular students withdrew during the most recently completed award year, in accordance with 34 CFR 668.156(a)(2)(v). As part of this application, two institutions—Virginia Western Community College and Eastern Shore Community College—will serve as pilot sites. At Virginia Western Community College, the withdrawal rate for Program Year 2024-2025 was 6.3 percent, representing 324 withdrawals among 5,111 undergraduate regular students. At Eastern Shore Community College, the withdrawal rate for the same period was 2.0 percent, representing 13 withdrawals among 671 undergraduate regular students. Both institutions are well below the 33 percent threshold required for participation and are therefore in compliance with the regulatory standard.

Virginia certifies that the VCCS will ensure that the total number of students who enroll through the State process during the initial period will total no more than the greater of 25 students or 1.0 percent of enrollment at each institution participating in the State process.

Virginia certifies that the State will monitor, on an annual basis, each participating institution's compliance and require corrective action if found to be out of compliance.

Virginia certifies that the State will terminate an institution from the State process and prohibit participation of that institution in the State process for at least five years, if the participating institution refuses or fails to comply with the state process requirements.

State Contact



Signature

March 31, 2026
Date

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