

Career Pathway Programs & TIV aid



**Career Pathway Programs and Title IV Eligibility**

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**Mississippi Community College Board**  
September 15, 2015

David Bartnicki  
U.S. Department of Education

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**Background - Ability-to-Benefit (ATB)**

- Prior to July 1, 2012, a student who was not a high school graduate, did not meet one of the high school equivalents or who was not properly homeschooled, could become eligible to receive Title IV aid if they met one of the following ATB alternatives (484(d)(1)):
- Passed an independently administered Department of Education approved ATB test
- Completed at least 6 credit hours or 225 clock hours that are applicable toward a degree or certificate offered by the postsecondary institution
- Completed a State process approved by the Secretary
  - *To date, no State process has been sent for ED approval*

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**Background - Ability-to-Benefit (ATB)**

- Consolidated Appropriations Act, 2012 (Public Law 112-74) eliminated Title IV eligibility for students without a high school diploma (or equivalent)
- Recognized equivalent of a HSD includes:
  - GED certificate
  - Certificate or other official completion documentation demonstrating student has passed a state-authorized examination (such as the TASC, HiSET, etc.) that the state recognizes as equivalent to a high school diploma
    - certificates of attendance and/or completion are **not** included in this qualifying category

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### Career Pathway Programs & TIV aid

#### Background - Ability-to-Benefit (ATB)

- Recognized equivalent of a HSD continued:
  - Academic transcript of successful completion of at least a 2-year program acceptable for full credit toward a BA degree
    - Successful completion of associate's degree program;
    - Successful completion of at least 60 semester or 72 quarter credit hours that are acceptable for full credit toward a bachelor's degree at any institution; or
    - Enrollment in a bachelor's degree program where at least 60 semester or 72 quarter credit hours have been successfully completed
  - Excelled academically in high school and meets admission policy and enrolls in at least an AA degree or higher
  - Properly home schooled students

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#### “Grandfathered Students” Exception

- The Consolidated Appropriations Act of 2012 amended section 484(d) of the HEA to allow a student without a high school diploma (or recognized equivalent), and who attended an eligible program at a Title IV institution prior to July 1, 2012, to be eligible for Title IV aid under the previous ATB alternatives ([GEN-12-09](#))
- Eligible students were referred to as having been “grandfathered”
- *The new ATB provision in Pub. L. 113-235 (career pathway programs) does NOT affect the eligibility of students grandfathered under the 2012 provision*

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#### Changes in the Law

- Consolidated and Further Continuing Appropriations Act of 2015 (Pub. L. 113-235) enacted 12/16/14
- Changed section 484(d) HEA to allow a student who does not have a high school diploma (or recognized equivalent), or who was not properly homeschooled, to be eligible for Title IV aid through ability to benefit (ATB) alternatives, but **ONLY if the student is enrolled in an “eligible career pathway program”**
  - Any type of institution may offer eligible career pathway programs
  - *No requirement to offer eligible career pathway programs*

Guidance - GEN-15-09

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Eligible Students

- Students enrolled in an eligible career pathway program, on or after July 1, 2014, (who are not HS graduates, properly homeschooled, or do not meet HS equivalent conditions) may be eligible to receive Title IV aid if meet one of the following ATB alternatives (484(d)(1)):
- Passes an independently administered Department of Education approved ATB test
- Completes at least 6 credit hours or 225 clock hours that are applicable toward a degree or certificate offered by the postsecondary institution
- Completes a State process approved by the Secretary
  - *To date, no State process has ever been sent for ED approval*




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Approved ATB Tests

Electronic Announcement – June 24, 2015

- Newly approved ATB tests – effective July 1, 2015
- Wonderlic Basic Skills Test Verbal Forms VS-1/VS-2, Quantitative Forms QS-1/QS-2 – **both paper and online**
- **Spanish** Wonderlic Basic Skills Test Verbal Forms VS-1/VS-2, Quantitative Forms QS-1/QS-2 – **both paper and online**
  - Effective November 1, 2015, only these two Spanish ATB tests are permitted for ATB purposes for Spanish speaking students




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Approved ATB Tests

Electronic Announcement – June 24, 2015

- Continuing ATB tests
  - CELSA Forms 1 and 2 & ACCUPLACER
  - ASSET, COMPASS AND COMPASS ESL
    - *eligible through 10/31/15*

For ATB passing scores, publisher contact information and list of ATB tests no longer approved, please see the 6/24/15 EA for more information on ifap.ed.gov




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**Administering ATB Tests**

- Test must be *independently and properly* administered
- Only a certified test administrator can proctor ATB tests
- Independently administered means:
  - Given at an assessment center by an employee who is a certified administrator or
  - Given by a certified independent test administrator
- Assessment centers that score the test must provide:
  - Weekly all copies of the completed test or a report with the scores of all test takers to the test publisher
  - Name and address of the test administrators (any identifiers)
  - Prompt notification to school and student of score and if he passed the test

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**Administering ATB Tests**

**Assessment center**—A facility that

1. is located at an eligible school that provides two- or four-year degrees or is a postsecondary vocational institution;
2. is responsible for gathering and evaluating information about students for multiple purposes, including course placement;
3. is independent of admissions and financial aid processes at the school;
4. has professionally trained staff
5. uses test administrators to proctor ATB tests; and
6. does not have as its primary purpose the administration of ATB tests

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**Administering ATB Tests**

- Schools must keep for each person who took an ATB test:
  - Name of the test and the date taken
  - Score(s),
  - Name and address of the test administrator (any identifiers)
- Whether a test taker had a disability and requested or required accommodations, documentation of her disability, and the arrangements that were provided
- A person who fails a test may not retake the same form of the test for the period prescribed by the publisher

34 CFR 668, subpart J  
2011-2012 FSA HDBK, Vol. 1

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**Eligible Career Pathway Program**

“Career pathways refer to a combination of rigorous and high-quality **education, training, and support services** that are aligned with the **skill needs of industries** in State or regional economies, preparing individuals to be successful in **secondary or postsecondary education programs** and the **labor market.**”



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**Eligible Career Pathway Program**

- An eligible career pathway program (484(d)(2)) must:
  - Concurrently enroll students in connected adult education and eligible postsecondary programs;
  - Provide students with counseling and supportive services to identify and attain academic and career goals;
  - Provide structured course sequences that—
    - Are articulated and contextualized; and
    - Allow students to advance to higher levels of education and employment;



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**Eligible Career Pathway Program**

- An eligible career pathway program (484 (d)(2)) must:
  - Provide opportunities for acceleration for students to attain recognized postsecondary credentials, including degrees, industry relevant certifications, and certificates of completion of apprenticeship programs;
  - Be organized to meet the needs of adults;



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**Eligible Career Pathway Program**

- An eligible career pathway program (484 (d)(2)) must:
  - Be aligned with the education and skill needs of the regional economy; and
  - Have been developed and implemented in collaboration with partners in business, workforce development, and economic development



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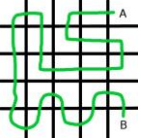
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**Eligible Career Pathway Program**

- Eligible career pathway programs contains 2 components:
  - *an adult education component, and*
  - *a Title IV eligible postsecondary program component*



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**Eligible Career Pathway Program**

- **Adult Education Component:** academic instruction and education services *below the postsecondary level* that increase individual's ability to:
  - Read, write, and speak in English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent;
  - Transition to postsecondary education and training;
  - Obtain employment

Same definition as Adult Education and Family Literacy Act, Title II of the Workforce Innovation and Opportunity Act

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**Eligible Career Pathway Program**

- Title IV eligible postsecondary program component: must meet definition of an eligible program under 34 CFR 668.8 in order for students enrolled in the eligible career pathway program to be eligible for Title IV aid
- Includes all coursework of the TIV eligible academic program

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**Eligible Career Pathway Program**

- An eligible career pathway program, as defined in section 484(d)(2) of the HEA, is *not itself a TIV eligible program* under 34 CFR 668.8 *because it contains an adult education component that includes, by definition, coursework that is below the postsecondary level*
- An eligible career pathway program will never be submitted to ED for approval
  - Will never appear on your ECAR
- The school must determine if a career pathway program meets the criteria as outlined in the law and GEN-15-09
  - If necessary, must provide documentation to auditors and reviewers

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**Eligible Career Pathway Program**

Restrictions

- May not include cost of the adult education component of an eligible career pathway program in student's Cost of Attendance (COA)
- May not pay for the cost of the adult education component using Title IV aid
  - only costs that can be included in COA are those associated with the Title IV eligible postsecondary program component



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**Eligible Career Pathway Program**

Restrictions

- Credit or clock hours associated with adult education coursework cannot be incorporated into a student’s Title IV enrollment status, regardless of whether the institution considers the adult education coursework to be remedial
- Remedial coursework associated with the Title IV eligible postsecondary program component is eligible for TIV aid within normal remedial limits  
– 30 semester hours; 45 quarter hours; 900 clock hours

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**Eligible Career Pathway Program**

Career Pathway Program Definitions:

- The definition of an eligible career pathway program under section 484(d)(2) of the HEA *may differ* from definitions under the Workforce Innovation and Opportunity Act, and in other laws, including State and local laws
- A program that qualifies for funding under the Workforce Innovation and Opportunity Act or another law *may not* meet the definition of an eligible career pathway program in section 484(d)(2) of the HEA

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**Eligible Career Pathway Program**

Career Pathway Program Definitions:

“To provide Title IV aid to students under one of the ATB alternatives under the new law, **an institution must ensure that its eligible career pathway program(s) meets the requirements under section 484(d)(2) of the HEA as described in GEN-15-09”**

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**Eligibility Timeframes**

- Student enrolled in an eligible career pathway program as of July 1, 2014, and who meets one of the ATB alternatives prior to July 1, 2014, may be awarded:
  - Pell Grant, TEACH Grant, and Campus-Based aid beginning with 1<sup>st</sup> payment period of 14/15 in which student was enrolled
  - DL can be awarded for entire loan period that includes 7/1/14

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**Eligibility Timeframes**

- Student enrolled in an eligible career pathway program as of July 1, 2014, and who meets one of the ATB alternatives on or after July 1, 2014, may be awarded:
  - Pell Grant, TEACH Grant, and Campus-Based aid beginning with payment period in which student meets ATB alternative
  - DL can be awarded for the entire loan period that includes the date when student meets the ATB alternative

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**Limited Pell Grants**

- Any student whose first enrollment in ANY Title IV eligible postsecondary program was on or after July 1, 2015, and is eligible under one of the ATB alternatives for enrollment in an eligible career pathway program, will **ONLY** be eligible for a Limited Pell Grant award
  - Maximum *limited* Pell Grant amount for 15/16 is **\$4,860**
  - Maximum *regular* Pell Grant amount for 15/16 is **\$5,775**

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Limited Pell Grants

- Calculation of the percentage of the annual Scheduled Award used (Pell Lifetime Eligibility Used – LEU) will be based on the student’s full Scheduled Award under the Regular Pell Grant Payment Schedule
  - A student only eligible for Limited Pell Grant with 0 EFC for 15/16 used 84.1558 percent (\$4,860 / \$5,775) of 15/16 Scheduled Award
- Career Pathway Alternative Pell Grant Disbursement Schedules is attached to GEN-15-09




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Limited Pell Grants

- **IMPORTANT:** Schools are responsible for determining student eligibility and the correct award amount for students who receive a Federal Pell Grant award under the Career Pathway Alternative Pell Grant Disbursement Schedules
- At this time, COD does not contain these schedules and there are no system edits on the Pell Grant award amount related to these schedules

7/9/15 Electronic Announcement




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Regular Pell Grants

- Eligible student whose first enrollment in ANY Title IV eligible postsecondary program was before July 1, 2015, and who is enrolled in an eligible career pathway program in or subsequent to the 2015–2016 award year, is eligible for a Regular Pell Grant award
- Regular Pell Grant Payment and Disbursement Schedules for 15/16 published in GEN-15-02




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### Pell Grant Determination

- An institution must document its determination whether a student qualifies for a Limited Pell Grant award or a Regular Pell Grant award for 15/16 and beyond
- Could include documentation from NSLDS showing receipt of TIV aid or a transcript from a previous school demonstrating student enrolled in an eligible program at a Title IV institution



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Title IV Eligibility for Students Without a Valid High School Diploma or Its Recognized Equivalent Who Are Eligible Under One of the ATB Alternatives				
First Enrolled in Any Title IV Eligible Postsecondary Program				
		Prior to July 1, 2012 (Grandfathered Students)	On or after July 1, 2012, but prior to July 1, 2015	On or after July 1, 2015
Type of Program in Which Student is Currently Enrolled	Title IV eligible postsecondary program that is part of an eligible career pathway program	Eligible for Title IV aid, including a <u>Regular Pell Grant award*</u> for all award years, including 2014-2015 and thereafter	Eligible for Title IV aid, including a <u>Regular Pell Grant award*</u> for only 2014-2015 and thereafter	Eligible for Title IV aid, including a <u>Limited Pell Grant award**</u> for only 2015-2016 and thereafter
	Title IV eligible postsecondary program that is NOT part of an eligible career pathway program	Eligible for Title IV aid, including a <u>Regular Pell Grant award*</u> for all award years, including 2014-2015 and thereafter	Not eligible for Title IV aid	Not eligible for Title IV aid

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### Career Pathway Program Reminders

1. Maintain documentation and process to support eligible career pathway program
2. Develop process/system to ONLY pay TIV aid for coursework associated with TIV eligible program component
3. Make a clear distinction between remedial coursework that is part of the adult education component and any remedial coursework that is part of the TIV eligible program component
5. Establish procedures to ensure students meet ATB alternatives (proper ATB tests, hour completion)



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### Career Pathway Programs & TIV aid

#### Career Pathway Program Reminders

5. Create process to identify “grandfathered” students under the old ATB eligibility rules
6. Develop a process/system to identify when career pathway students first enrolled in a TIV eligible academic program (before or on/after July 1, 2015) to determine which 15/16 Pell disbursement chart to use – limited Pell vs. regular Pell
7. Ensure process/system to properly pay eligible students under limited Pell disbursement chart

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#### Department of Education Contacts

**Research and Customer Care Center**  
 800.433.7327  
 fsa.customer.support@ed.gov



**Reach FSA**  
 855.FSA.4FAA -- 1 number to reach 10 contact centers!

<i>Campus Based Call Center</i>	<i>eZ-Audit</i>
<i>COD</i>	<i>School Eligibility Service Group</i>
<i>CPS/SAIG</i>	<i>Foreign Schools Participation Division</i>
<i>NSLDS</i>	<i>Research and Customer Care Center</i>
<i>G5</i>	<i>Nelnet Total &amp; Permanent Disability Team</i>

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#### Contacts

- Atlanta School Participation Team
- Main Number: 404-974-9303
- Cassandra Weems (IIS) 404-974-9305
- Atlanta Training Officers
- David Bartnicki – 404-974-9312
- Email – firstname.lastname@ed.gov



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**Training Feedback**

To ensure quality training we ask all participants to please fill out an online session evaluation

- Go to <http://s.zoomerang.com/s/DavidBartnicki>
- Evaluation form is specific to David Bartnicki
- This feedback tool will provide a means to educate and inform areas for improvement and support an effective process for "listening" to our customers
- Additional feedback about training can be directed to [joann.borel@ed.gov](mailto:joann.borel@ed.gov)

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**Questions?**



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