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 U.S. Census Bureau, 550,889 of Washington state’s residents age 18 and over are in need of a high school credential, or 7.35% of the state’s population. In the 2018-2019 academic year, Washington state colleges served 48,727 students with basic skills needs. Over 67% 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 21+ 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 21+ 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.” In order to serve more students in eligible career pathway programs and thus boost individual and national economic growth, Washington state proposes a 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 21+ 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.
The State Board is currently designing a process whereby we will be able to track Ability to Benefit use statewide by quarter. As part of this data collection we will collect information on AtB students for the following metrics:

- Credits earned
- GPA
- Federal Educational Functioning Levels (Basic Skill levels) increased
- Diplomas, certificates & degrees earned
- Employment 2nd & 4th quarter after exit
- Median earnings

These would be broken down by demographics: gender, age, ethnicity, income, etc.

**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 21+ undergo rigorous orientation. Upon entering the High School 21+ 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 21+ and I-BEST use multiple measures for assessment. Through High School 21+, 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 21+, 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 21+ 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 21+ 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 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 21+. 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.

If an institution is not able to demonstrate that they have met the requirements of the corrective action plan one quarter subsequent to the, then they will no longer be approved to use the state-defined process for a period of one academic year, starting from the time at which the institution has been deemed out of compliance. The institution will be removed from the list of eligible institutions approved to offer the state-defined process.

Student Success Rate
Success rate data will be tracked by SBCTC and findings will be reported to the Department of Education as required by 34 CFR § 668.156. As part of SBCTC’s tracking of this information, the agency will monitor student success rates per-institution. Institutions who place students on ATB using the state-defined process and who do not meet the required student success rate will be placed on a corrective action plan and provided technical assistance to strengthen navigational services so that student success rates are improved. If after one quarter the institution does not demonstrate improvement, the institution will no longer be able to enroll students in ATB using the state-defined process, and the institution will be removed from the list of eligible institutions for offering the state-defined process.

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. All students with concern flags receive phone calls from Peer Navigators (trained work-study students).

Institutions can also create ATB-specific tracking codes that identify ATB status, the advisor or navigator assigned to the student based on their pathway, and the quarter of initial ATB eligibility. ATB students can be required to meet with their advisor and/or navigator prior to registration, helping to ensure timely supports to students as they work to complete their pathway program and enter the workforce.

Questions
Jon Kerr
Director, Basic Education for Adults
Washington State Board for Community and Technical Colleges
jkerr@sbctc.edu | 360.704.4326
www.sbctc.edu