

Illinois' Proposed Alternative to Ability to Benefit State Plan Frequently Asked Questions – Updated October 6, 2021

State Plan: [link](#)

Ability To Benefit

1. Q: What is Ability to Benefit (ATB)?

A: Ability to Benefit is a provision of the federal Higher Education Act that allows students without a high school diploma to receive federal financial aid under Title IV. There are three methods for which a student without a high school diploma, meeting all other federal financial aid criteria, can benefit from financial aid:

- a. Score above a certain cut score on an approved ATB Standardized Assessment: <https://www.federalregister.gov/documents/2020/11/09/2020-24795/list-of-approved-ability-to-benefit-atb-tests-and-passing-scores>
- b. Earn 6 college credit hours
- c. Be eligible after assessment through a State's Alternative Process

2. Q: Please confirm that Ability to Benefit is only needed for the first 6 credit hours a student earns. A student becomes financial aide eligible after attaining 6 credit hours even if they have not passed the GED test (and they are not participating in Ability to Benefit).

A: Yes, this statement is partially correct. The alternative process can help them pay for those first 6 credit hours, accessing federal financial aid. Either way (before or after the 6 credit hours), they are still an "ATB student" until they have achieved their HSE. There may be implications for them shall they transfer to another institution or try to enroll in a specific career program that requires an HSE (many health programs come to mind).

For more information on federal financial aid or Ability to Benefit, please check out these resources:

[CLASP link](#)

[USDOE ATB link](#)

Institutional Participation in Illinois' ATB Alternative State Plan

3. Q: How can an institution participate as a part of Illinois' Alternative State Process?

A: Institutions must complete and submit an Institutional Participation Form (Appendix A of the Plan) to angela.gerberding@illinois.gov by November 12, 2021. Institutions *must* be listed in the Plan when it is submitted for approval to the Department of Education on November 15, 2021 in order to utilize the Alternative Process for ATB during the plan period of July 1, 2022- June 30, 2027. Institutions can not opt in at a later date.

4. Q: Can an institution opt to participate, but never enroll a student through Ability to Benefit?

A: Yes, opting into the Plan only means that the institution has the *opportunity* to utilize the Alternative Process. It *does not require* that the institution utilize the Alternative Process.

5. Q: What institutions can opt into Illinois' Alternative ATB Plan?

A: Illinois community colleges.

6. Q: Does an institution have to participate in the plan in order to utilize the two currently approved ATB methods (standardized test / 6 college credit hours)?

A: No, institutions are currently allowed to utilize Ability to Benefit through the two currently approved methods, as authorized by the Higher Education Act, without participating in the State's Alternative Plan Process.

Illinois' ATB Alternative Process

7. Q: If a student holds a high school diploma but has been assessed as basic skills deficient, are they ATB eligible?

A: No. If a student already holds a high school diploma, or its equivalency, they are eligible for federal financial aid, but the institution through its admission and assessment processes may encourage or require students to participate in adult basic education or development education programming prior to enrolling in credit programming.

8. Q: Is an eligible ATB student required to complete a secondary school credential as a part of their program?

USDOE Response: No. A student who seeks Title IV eligibility under the ATB alternatives (ATB student) enrolled in an eligible career pathway program *must have the opportunity* as part of the program to attain a secondary school diploma or its recognized equivalent. A career pathway program would be considered eligible for the purposes of the Title IV aid programs, as described in Section 484(d)(2)(F) of the HEA, if students enrolled in the eligible career pathway program do not obtain a high school diploma or its recognized equivalent, even if they have finished the requirements for earning a postsecondary credential. It is important to note, however, that completion of an eligible career pathway program does not enable a student to subsequently become Title IV eligible as a non-ATB degree seeking student unless that student completes the high school diploma portion of the eligible career pathway program or earns a GED certificate or another recognized equivalent of a high school diploma.

9. Q: How does the Department of Education determine whether a program enables an individual to attain a secondary school diploma or its recognized equivalent?

USDOE Response: Under Section 484(d)(2)(F) of the HEA, an eligible career pathway program must enable a student to attain a secondary school diploma or its equivalent. In determining whether an eligible career pathway program meets this requirement, the Department considers whether the program provides this opportunity in a way that is reasonably accessible to enrolled students, such as by offering instruction through distance learning (including through synchronous or asynchronous modalities) and offering a range of instructional options that are reasonably convenient for students. The Department will accept reasonable institutional scheduling decisions relating to this matter.

10. Q: Does an "eligible career pathway program" need to be approved by the U.S. Department of Education or the ICCB?

A: No. The U.S. Department of Education and the ICCB do not approve career pathways. An eligible Career Pathway must meet the definition as referenced in the Plan and must be of one of the Approved Career Clusters identified in Appendix B of the Alternative State Plan. Institutions must document how each program allowed for ATB use meets the definition of a Career Pathway.

11. Q: Do students have to be enrolled in an Integrated Education and Training program to participate as a part of the ATB Alternative Process?

A: No. While the ICCB envisions that an integrated education and training program is a very appropriate use for Ability to Benefit, it is not required that students are in an IET program to benefit from the Alternative Process.

12. Q: Are students with high school diplomas from a different country other than the United States eligible for ATB?

A: This is dependent on the student's eligibility as determined by the federal government: <https://studentaid.gov/understand-aid/eligibility/requirements>. There are basic criteria for citizens and eligible non-citizens. Illinois' Alternative State Plan only addresses students who could otherwise benefit from financial aid, but do not hold a high school diploma or its equivalency. If a student holds a high school diploma from the United States or another country, the institution should utilize its current transcript evaluation processes to understand how it equates to Illinois' high school equivalency requirements. The assessment process identified in the Alternative State Plan does not seek to supersede those processes; however, this does not mean that students with high school diplomas awarded from a different country other than the United States are not eligible or ideal candidates for the Alternative Ability to Benefit process.

13. Q: Once a student achieves their high school equivalency, what does that mean for them?

A: Once a student achieves their high school equivalency, they are no longer benefiting from financial aid as an ATB student and are considered a non-ATB student. These students should continue to have access to academic and non-academic supports available to ATB students in order to support their postsecondary attainment. For the academic year in which they achieve their HSE, they should/will be included in the Success Rate calculation for students without a high school diploma until the next academic year.

13. Q: Are ATB students eligible for MAP funding?

A: Students eligible for federal financial aid are generally eligible for MAP funding. For more information, visit the Illinois Student Assistance Commission's website on MAP eligibility: <https://www.isac.org/students/during-college/types-of-financial-aid/grants/monetary-award-program/#Eligibility>.

14. Q: Are there cut scores pre-set for the allowable assessments under the Alternative Process?

A: There are no pre-set cut scores or thresholds for any of the allowable assessment methods. These are institutional decisions; however, many tests, practice tests, and other assessment methods already identify levels of readiness that should be taken into consideration.

15. Q: Are students required to utilize the 6 required student services or are institutions simply required to offer and encourage them?

A: Institutions MUST offer these services and students are expected to participate in any required academic counseling, goal setting, and orientation meetings.

16. Q: If a student completes a postsecondary credential, does the student automatically receive their high school equivalency? If so, who grants the HSE?

A: Under current state policy, the student would not automatically receive their high school diploma or its equivalency; however, the ICCB is exploring this policy option for utilization, particularly if the student completes the General Education Core Curriculum credential or their AAS.

Success Rate Calculation

17. Q: Can you provide an example of the Success Rate calculation?

A:

Students with high school diplomas:

NUMERATOR: 720 students with HSD/E enrolled in participating institution in education and training that academic year AND either (1) successfully completed their program, (2) remained enrolled at the end of the AY, or (3) successfully transferred and remained enrolled at the end of the AY.

DIVIDED BY

DENOMINATOR: 1000 students with HSD/E who enrolled in participating institution in education and training programs that AY, (excludes students who withdrew or were expelled during the AY and who received a 100 percent tuition refund).

Success Rate for those with High School Diplomas: $720/1000 = 72\%$

Students without high school diplomas:

NUMERATOR: 13 students without HSD/E enrolled in participating institution in education and training that academic year AND either (1) successfully completed their program, (2) remained enrolled at the end of the AY, or (3) successfully transferred and remained enrolled at the end of the AY.

DIVIDED BY

DENOMINATOR: 19 students without HSD/E who enrolled in participating institution in education and training programs that AY, (excludes students who withdrew or were expelled during the AY and who received a 100 percent tuition refund).

Success Rate for those without High School Diplomas: $13/19 = 68.4\%$

Success rate for those without HSD must be 95% of success rate for those with HSD ($.684/.72 = 95\%$). Example Institution meets success rate for the AY!

18. Q: For the success rate calculation for students without a high school diploma, does the calculation include only those utilizing the Alternative Process or all three methods of ATB?

A: The ICCB is seeking clarification from the U.S. Department of Education on this question.