

Dual Enrollment for Adults

A Toolkit to Support the Use of Ability to Benefit in America's Colleges



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U.S. Department of Education

Linda McMahon
Secretary

Office of Career, Technical, and Adult Education

Casey K. Sacks, Ph.D.
Acting Assistant Secretary

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Content Contact: Erin Berg, Community College Program Specialist, at erin.berg@ed.gov

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Disclaimers

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Contents

Introduction	1
About DEAL	1
About the Toolkit	1
About Ability to Benefit	3
Benefits of Implementing ATB	3
Recent Changes to ATB	4
Understanding the ATB Eligibility Requirements	6
Understanding the ATB Options	6
The Test Option	6
The Credit-Hour Option	7
The ATB State Process Option	7
Eligible Career Pathway Programs	8
Defining ECPPs	8
Selecting an ECPP	9
Submitting an ECPP for Federal Approval	11
Implementing ATB at the Institutional Level	13
ATB Implementation Teams	13
ATB Planning and Implementation Stages	15
1. Establishing Shared Understanding and Vision	15
2. Finding Common Ground and Shared Commitment	16
3. Identifying an ECPP	16
4. Coordinating Student Services	17
5. Identifying ATB Students	17
6. Tracking ATB Students	18
7. Collecting and Reporting Data	18
8. Developing Marketing and Communication Strategies	18
Developing an ATB State Process	20
Benefits of the State Process Option	20
Convening an ATB State Team	21
Building the Foundation for a State Process	22
The State Process Application	25
Subsequent Application	26
Success Rate	27
Drafting the State Process Application	27
State Support for Institutions Implementing ATB	29
Promising Practices in ATB Implementation	31

Intentional and Sustained Systems	31
Clear and Collaborative Partnerships	33
Learner-Centered Approach	34
Conclusion	36
Resources	37
For Colleges, Institutions, and States	37
Appendix A. Frequently Asked Questions (FAQs)	39
Appendix B. Comparison of ATB Options	40
Appendix C. Comparison of Career Pathways, ECPPs, and IET Programs	41
Appendix D. Instructions for ATB Questions in E-APP	42
Appendix E. Getting Ready to Implement an Ability to Benefit (ATB) State Process: Planning Tool.	46
Appendix F. A Conversation with Financial Aid Directors	66
Appendix G. ATB State Team Self-Assessment	69
Appendix H. ATB State Process Action Plan Template	81



Introduction

About DEAL

The [Dual Enrollment for Adult Learners \(DEAL\)](#) project, funded by the U.S. Department of Education's (ED) Office of Career, Technical, and Adult Education (OCTAE), aims to support states in the development and implementation of Ability to Benefit (ATB) state processes, expanding adult learners' access to postsecondary education and training through the use of federal student aid. DEAL is led by the Manhattan Strategy Group LLC (MSG); World Education, an initiative of JSI; and RTI International.

This toolkit recognizes and references the efforts of the six states and 11 colleges that participated in DEAL activities between June 2025 and April 2026. These states and colleges were selected through an open application process to participate in a series of cohort-based and individualized technical assistance (TA) activities, during which the state teams developed and drafted tailored ATB state processes, while the college teams mapped out next steps for successful ATB implementation. The participating states and colleges also piloted the ATB planning and implementation tools developed for this project.

Table 1 lists the states and colleges that participated in DEAL to develop and implement ATB state processes.

Table 1. States and Colleges Participating in DEAL TA Activities

State	Colleges
Alabama	Gadsden State Community College Lurleen B. Wallace Community College
Connecticut	Connecticut State Community College
Idaho	College of Eastern Idaho College of Western Idaho
Kansas	Manhattan Area Technical College Seward County Community College
New Mexico	Mesalands Community College University of New Mexico – Valencia
Virginia	Eastern Shore Community College Virginia Western Community College



About the Toolkit

This toolkit, developed by the DEAL team, serves as a resource for institutions¹ and states interested in implementing and expanding ATB usage to support dual enrollment for adult learners. It has three objectives:

1. To increase the understanding of ATB among individual postsecondary institutions and state agencies overseeing higher education and adult education
2. To help colleges develop systems, cross-departmental collaboration, and processes for ATB implementation and expansion
3. To help state agencies understand how they can support ATB implementation, sustainability, and expansion in their states, including through the development of an ATB state process

¹ This toolkit uses the terms *institution* and *college* interchangeably to refer to 2- and 4-year public, private, and proprietary institutions of higher education.

This toolkit is designed for the wide range of stakeholders who have a role in supporting ATB implementation. These individuals can be convened through an implementation team, which will ultimately support ATB exploration, implementation, sustainability, and expansion.

- **At the institutional level**, ATB implementation teams should include staff with responsibility for adult dual enrollment, financial aid, career pathways and career and technical education (CTE), student services, admissions, institutional research, and data management. Adult education programs that provide high school equivalency preparation are also key stakeholders, and these programs may be administered by the college itself or by community organizations.
- **At the state level**, ATB implementation teams should include state agency staff with responsibility for adult education, CTE, postsecondary education, federal student aid, and student data; and representatives from colleges with experience implementing ATB. In some states, the team may also include other statewide stakeholders, such as the governor's office, staff with responsibility for correctional education, and research and policy staff.

Every state and institution is configured differently, so specific stakeholders and the agencies and departments they represent may vary. At a minimum, however, ATB implementation requires cross-functional and cross-departmental collaboration across adult education, postsecondary career pathways programs, and financial aid.

The toolkit is organized into eight sections:

1. **About ATB:** Foundational ATB information
2. **Understanding the ATB Eligibility Requirements:** Detailed information and advice on the different ATB eligibility requirements, including the three ATB options and eligible career pathway programs (ECPPs)
3. **Implementing ATB at the Institutional Level:** Information and advice for colleges seeking to implement ATB
4. **ATB Planning and Implementation Stages:** Detailed advice on planning and implementation for colleges seeking to implement ATB
5. **Developing an ATB State Process:** Information and advice for states seeking to develop and draft an ATB state process
6. **State Support for Institutions Implementing ATB:** Advice for states seeking to support statewide implementation of ATB beyond the state process
7. **Promising Practices in ATB Implementation:** Best practices and examples to guide states and institutions in ATB implementation
8. **Resources:** A comprehensive listing of resources to support states and institutions with ATB implementation



About Ability to Benefit

The ATB provision in the Higher Education Act gives eligible adults without a high school diploma or equivalent access to federal student aid. To be eligible for ATB, adults must meet the requirements for federal student aid and enroll in an Eligible Career Pathway Program (ECPP), which allows them to work towards completing a high school credential and earn a postsecondary credential at the same time.² They must also complete one of the three ATB eligibility alternatives (often referred to as *the three ATB options*):

1. Pass an ED-approved ATB test
2. Complete at least six credits hours or 225 clock hours applicable to a degree or certificate offered by a postsecondary institution
3. Participate in a state process approved by the Secretary of Education

The ATB eligibility requirements are discussed in detail in the following section, *Understanding the ATB Eligibility Requirements*.

ATB facilitates enrollment in adult education and postsecondary education, enabling financial support for adult learners to pursue postsecondary training for high-demand occupations while simultaneously completing a high school diploma or equivalent. For states, ATB also serves as a mechanism to increase access to postsecondary education and training, and as a result, addresses state and regional needs for a skilled workforce.

Benefits of Implementing ATB

The ATB benefits for adult learners are clear: namely, the ability to access federal student aid to participate in postsecondary training. However, ATB utilization also brings direct benefits and value to institutions and states.

Implementing ATB can **support colleges** in doing the following:

- Expanding adult learners' access to postsecondary education and federal student aid
- Supporting enrollment, retention, and completion rates for adult learners
- Developing and implementing an intentional adult dual enrollment strategy
- Increasing student enrollment by reaching a potentially untapped student population
- Developing partnerships with adult education providers, which can lead to reciprocal student referrals



Scaling ATB implementation statewide can **support states** in:

- Meeting the demand for trained workers in high-interest, high-growth industries and occupations
- Developing, implementing, and expanding an intentional adult dual enrollment initiative
- Accelerating adult learners' high school and postsecondary credential attainment, which prepares them quicker for in-demand, well-paying jobs
- Maximizing the impact of existing career pathways initiatives and models

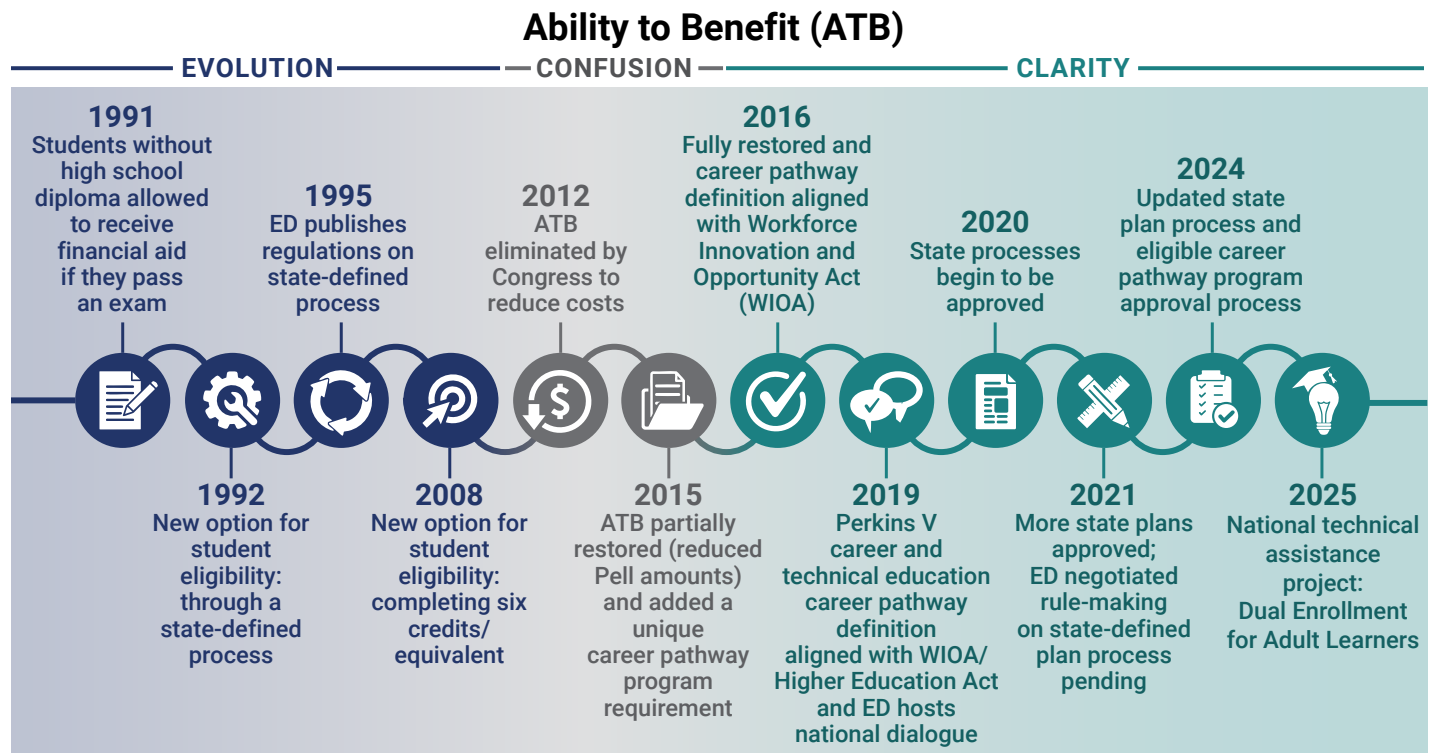
² If a student first enrolled in an eligible postsecondary program prior to July 1, 2012 (regardless of receipt of any Title IV aid), the student may enroll in any eligible program and can become eligible through one of the ATB alternatives.

“What appealed to us most about ATB was the student impact. ATB allows adults without a high school diploma or equivalent to access federal aid while pursuing education that leads to real workforce outcomes and gainful employment. It aligned closely with our mission as a community college—removing financial barriers, supporting workforce development, and serving nontraditional students who are often otherwise excluded from aid.” (*Christina Dollinger, Financial Aid Director at Palo Verde College*)³

Recent Changes to ATB

The ATB provision was added to the Higher Education Act in 1991 and has experienced fluctuations in use in the intervening years. In 2024, the regulations were updated following negotiated rulemaking in 2021–2022. ATB’s evolving nature, as highlighted in **Figure 1**, has led to confusion among many state systems and institutions. Understanding and building awareness of the current regulations is critical to ATB implementation.

Figure 1. Timeline of the Changes to ATB From 1991 to 2025



In 2024, ED announced regulatory changes to ATB and published multiple resources to support their implementation (see **Table 2**). There were two significant changes to the regulations:

1. The application and implementation requirements for the ATB state process option were updated; and
2. Institutions are now required to submit documentation for at least one ECPP via the Electronic Eligibility Application (E-App) for ED approval prior to awarding federal student aid to ATB-eligible students.

Both changes are covered in more detail in the sections *The State Process Application* and *Eligible Career Pathway Programs*.

³ Interview with Christina Dollinger, April 28, 2026.

Table 2. Federal Guidance on Regulatory Changes to ATB in 2024

Information for states and institutions	Information for institutions
(GEN-24-08) Ability to Benefit State Process and Eligible Career Pathway Programs This Dear Colleague Letter, published on June 12, 2024, details changes made to the ATB state process regulations at 34 § 668.156 and the addition of regulatory requirements for ECPPs at 34 CFR § 668.157. It includes a breakdown of how to calculate the ATB success rate for the state process and a list of examples of acceptable documentation for institutions to submit during the ECPP approval process.	(GEN-24-151) Applying for Title IV Approval of an Eligible Career Pathway Program for Ability to Benefit This Electronic Announcement, published on December 23, 2024, clarifies the submission process for institutions submitting their ECPPs for ED approval in the E-App.

Workforce Pell: In addition to the 2024 ATB regulations update, final regulations for the new Workforce Pell provisions went into effect July 1, 2026. Guidance regarding Workforce Pell intersection with ATB was not available at the time of writing this toolkit. However, this should not prevent workforce and adult education teams from proactively aligning their efforts to leverage both provisions, as an ECPP could be an eligible workforce program for Workforce Pell if all conditions are met under regulation [668.157](#) and [690 Subpart H](#). Through the work advocated for in this toolkit, stakeholders can strategically bridge these efforts to maximize support for adult learners who opt for a short term, Workforce Pell-eligible program.



Understanding the ATB Eligibility Requirements

This section provides detailed information and advice on the ATB eligibility requirements, including information on the three ATB alternatives (the test option, the credit-hour option, and the state process option), ECPPs, and what to consider when selecting an ATB option or an ECPP for implementation.

Understanding the ATB Options

To be eligible for ATB, an adult must:⁴

- Complete one of the three ATB options:
 - Pass an independently administered ATB test approved by ED (the test option)
 - Complete at least six credit hours, or 225 clock hours, that are applicable toward a degree or certificate offered by the postsecondary institution (the credit-hour option)
 - Complete a state process approved by the U.S. Secretary of Education (the state process option)
- Be enrolled in an ECPP (unless enrolled prior to 7/1/12), *and*
- Meet all eligibility requirements for federal student aid, including status as a U.S. citizen or an eligible noncitizen, as listed in ED's [Federal Student Aid guidance](#).

While all three ATB options benefit learners, which option(s) is the best fit for your students and your institution may depend on several factors, including:

- Student characteristics
- Approved ATB tests available at your institution
- Funding streams to cover the costs of the six credit hours for ATB eligibility
- The availability of a state process in your state

Institutions can implement more than one option to address their students' needs and their unique context. For example, for students with higher educational attainment, recent experience in the K–12 system, or comfort with standardized testing, the test option may allow them to become eligible for ATB more quickly. For others, the credit-hour option may provide them with an on-ramp to build the skills and access the supports they need to succeed as an ATB learner.

The following subsections detail the requirements for each option and highlight how community or technical colleges have implemented the option. Also see [Appendix B](#) for a chart comparing the three ATB options.

The Test Option

To be eligible for ATB via the test option, a student must successfully pass an independently administered ATB test approved by the U.S. Secretary of Education. As of August 2025, three tests are currently approved for the test option:

- the Combined English Language Skills Assessment (CELSA),
- the ACCUPLACER, and
- the Texas Success Initiative (TSI) Assessment.

For more details on these tests and passing scores, see Federal Student Aid's Federal Register Notice, entitled "[List of Approved Ability to Benefits Tests](#)." **Strong partnerships with the institution's assessment and admissions departments are crucial to support students using the test option.**

⁴ If a student first enrolled in an eligible postsecondary program prior to July 1, 2012 (regardless of receipt of any Title IV aid), the student may enroll in any eligible program and can become eligible through one of the ATB alternatives.

For Example: Adult learners at [Meridian Community College](#) in **Mississippi** take the ACCUPLACER to determine their eligibility for credit-bearing career pathways and ATB. Adult education staff leverage three strategies to ensure readiness for the ACCUPLACER for learners without a high school equivalency: completing a workforce preparation course (SMART Start), passing two subjects of a high school equivalency exam such as the GED®, and earning at least a Level 3-BRONZE on the [ACT WorkKeys](#)/National Career Readiness Exam (which is covered in the SMART Start class). Adult education staff at the college have determined that students who pass part of the high school equivalency exam and succeed in the workforce preparation course are more likely to achieve the required ACCUPLACER score. These students are more likely to succeed in dual enrollment, which comprises enrollment in Mississippi Integrated Basic Education and Skills Training (MI-BEST) career pathways with credit-bearing CTE courses and high school equivalency classes. Once enrolled in a MI-BEST program, ATB learners can also take advantage of Mississippi's competency-based high school equivalency policy to minimize testing and take ACT WorkKeys subject tests to complete their high school equivalency as they progress through the career pathway.⁵

The Credit-Hour Option

A student must complete at least six credit hours, or 225 clock hours, that are applicable toward a degree or certificate. These hours do not have to be in the program of study they ultimately want to attend. Since federal student aid cannot cover the cost of the first six credits or 225 clock hours, one key challenge of implementing the credit-hour option is identifying a funding source that can cover the cost to minimize the burden on students. **Colleges have drawn on a variety of funding sources to cover the cost of the first six credits or 225 clock hours**, including Workforce Innovation and Opportunity Act (WIOA) Title I funding, state financial aid initiatives, private foundations, and college foundations. For instance, the Louisiana Community and Technical College System has historically used set-asides from tuition increases for its statewide 5 for 6 Scholarship.

For Example: At [Hinds Community College](#) in **Mississippi**, learners obtain ATB eligibility through the test option and the credit-hour option. After assessing initial eligibility and interest in ATB, adult education staff conduct individual intakes with students to determine which funding streams may best support their initial six credit hours. The college leverages several funding sources, including WIOA Title I, the Mississippi Department of Human Services, the Kellogg Foundation, and SNAP Employment & Training, so that students have sufficient financial support while they are working toward becoming eligible for federal student aid as ATB students. Staff credit their success in supporting students through these first six credit hours to always having multiple funding streams available. Staff aim to maintain alternatives for funding the first six credits, so that if students are not eligible for one funding stream, there is another option for which they may be eligible.⁶

The ATB State Process Option

For institutions in a state with an approved state process, this option offers another opportunity while adding requirements for state monitoring and institutional performance. Though the eligibility requirements and other details of a state process are unique to each state, multiple required elements shape institutions' implementation of a state process—the student success rate, initial student enrollment limits, and data monitoring.

More information and advice on developing and implementing an ATB state process can be found in the [Developing an ATB State Process](#) section.

For Example: **Skagit Valley College (SVC)** in **Washington state** serves approximately 55 ATB students every year. While some students may become eligible for ATB through the test option, most of the students enroll via the Washington ATB state process or by completing six college credits. Through the state process, learners can enroll in one of the college's Integrated Basic Education and Skills Training (I-BEST) programs and become ATB students if

⁵ Smith, Rhonda. 2026. Interview for DEAL Toolkit about ATB at Meridian Community College.

⁶ Taylor, Tiffany. 2026. Interview for DEAL Toolkit about ATB at Hinds Community College.

they are eligible for federal student aid and do not have a high school credential. SVC currently offers twelve I-BEST pathways consisting of 47 I-BEST class sections annually.

To ensure effective student advising and compliance with the state process guidelines, college administrators rely on the statewide database that allows them to flag ATB learners and require that they participate in an advising session before enrolling in their courses each semester. Through these advising sessions, ATB learners discuss updates to their plans for attaining a high school diploma and modify their course load to prepare for their future educational plans. In addition, ATB learners benefit from having a dedicated financial aid advisor who is an expert on ATB, as well as advisors focused on high school completion.

[Skagit Valley College Basic Education](#) staff credit their success with ATB to the institutional collaboration among financial aid, advising, and adult basic education. The creation of an ATB handbook has also helped them through staff transitions, ensuring that key practices for supporting ATB learners are sustained.⁷

Key Takeaways

- Institutions can implement any of the three ATB options based on their students' goals and needs, existing institutional resources and partnerships, and the availability of a state process.
- For students who can pass the approved standardized assessments, the **test option** provides a quick pathway to gain ATB eligibility. This option requires strong partnerships with assessment and admissions departments.
- The **credit-hour option** allows students who have completed six credit hours or 225 clock hours to become eligible for ATB, but it also requires staff to locate additional funding options to minimize the cost of those first six credits.
- For states that have an ATB state-defined process, the **state process option** can offer an accelerated pathway to ATB enrollment. See the section *Developing an ATB State Process* for more information.

Eligible Career Pathway Programs

In addition to completing one of the three ATB options above, ATB learners must enroll in an ECPP, which enables them to work towards completing a high school credential and earn a postsecondary credential at the same time.

Regardless of what ATB option an institution uses, the institution must submit at least one ECPP to ED for approval via the E-App. Once the first ECPP has been approved, an institution can offer more ATB ECPPs without approval but the institution still must notify the Department of additional programs and certify that all other ATB ECPPs meet the regulatory requirements. Additionally, the Department may choose to review any subsequent ATB ECPPs offered. Institutions should maintain documentation for all ECPPs in case of audit or program review.

Defining ECPPs

ECPPs build upon the definition of career pathways that is consistent across three pieces of legislation that are relevant to ATB stakeholders: WIOA, which authorizes adult education; Strengthening Career and Technical Education for the 21st Century Act (Perkins V), which authorizes career and technical education; and the Higher Education Act, which authorizes higher education. In all three acts, *career pathways* are defined as the following:

A combination of rigorous and high-quality education, training, and other services that

- (A) aligns with the skill needs of industries in the economy of the state or regional economy involved;*
- (B) prepares an individual to be successful in any of a full range of secondary or postsecondary education options;*
- (C) includes counseling to support an individual in achieving the individual's education and career goals;*
- (D) includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;*

⁷ Gelwicks, Carla. 2026. Interview for DEAL Toolkit about ATB at Skagit Valley College.

- (E) organizes education, training, and other services to meet the needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;
- (F) enables an individual to attain a secondary school diploma or its recognized equivalent, and at least one recognized postsecondary credential; and
- (G) helps an individual enter or advance within a specific occupation or occupational cluster.⁸

In compliance with federal guidance, all ECPPs must align with the above definition of career pathways.

Colleges and adult education partners with established career pathways program models, such as [integrated education and training \(IET\)](#), should consider building on these programs to create successful ECPPs. IET is defined in WIOA as *a service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement.*⁹ The regulatory language regarding ECPPs, IETs, and other career pathways programs all speak to the importance of the following concepts:

- **Concurrent components:** Providers are required to offer education and training concurrently. For ECPPs and IET programs, providers must offer workforce preparation activities, workforce training, and adult education and literacy activities.
- **Credential attainment:** ECPPs, IET programs, and career pathways programs all refer to the requirement of enabling students to attain a secondary school diploma or its recognized equivalent and at least one recognized postsecondary credential.
- **Workforce alignment:** ECPPs, IET programs, and career pathways programs all recognize the importance of program alignment with industries' skill needs and the program's relevance to regional and state labor market needs.

A key distinction between an ECPP and other noncredit and credit pathway models is that an ECPP must first and foremost satisfy all other requirements for Title IV eligibility described under [34 CFR 668.8](#). For example, generally the program length must be a minimum of 15 weeks and at least 600 clock hours, 16 semester or trimester hours, or 24 quarter hours. Therefore, while an IET or other career pathway program can serve as a strong foundation for an ECPP, the program may need to be extended in order to be a Title IV-eligible program. See [Appendix C](#) for a table for a comparison of career pathways programs, ECPPs, and IET programs.

Selecting an ECPP

When selecting an ECPP, there are numerous factors to consider that rely on input, information, and data from a variety of sources. A well-rounded, cross-departmental ATB implementation team will have the broader reach needed to gather information and incorporate the following considerations into its decision-making process:

- **Existing career pathways:** Identify current career pathways and adult dual enrollment initiatives, such as IET programs or [guided pathways](#), that can be leveraged rather than launching a new program. If an existing program is not already Title IV-eligible, consider if it is feasible to build it out to meet the eligibility requirements (e.g., extending the duration and intensity of the program).
- **Career pathways elements:** Ensure that programs include the required components of a career pathway.
- **Labor market information (LMI):** Evaluate state and regional labor market data to prioritize industries with a high projected demand for job openings, living wages, and clear opportunities for career advancement. To ensure accuracy, labor market information should be gathered from a range of sources, including federal and state LMI websites, CTE advisory boards, and local workforce development boards.
- **Stackable credentials:** Ensure that the target credentials for the program are stackable (i.e., they provide immediate labor market value while also serving as building blocks for future learning).

⁸ Workforce Innovation and Opportunity Act of 2014, 29 U.S. Code § 3102.

⁹ Workforce Innovation and Opportunity Act of 2014, 29 U.S. Code §463.35.

- **Industry collaboration:** Leverage programs that have established support and active collaboration with industry partners and employers within the target sector to ensure curriculum relevance and job placement.
- **Return on investment (ROI):** Consider the program's ROI for adult learners to ensure the financial and time commitments are justified.
- **Logistical flexibility:** Determine if the program's duration, schedule, and intensity are appropriately designed to accommodate the multiple responsibilities and complex schedules of ATB learners, who will also be simultaneously preparing to attain their high school diploma or equivalent.
- **Program performance:** Review current program performance metrics, including enrollment trends, completion rates, and student satisfaction.
- **Student interest:** Gauge adult learners' genuine interest in the career pathway and assess their fit for its specific requirements.
- **Faculty preparedness:** Identify faculty who possess experience teaching adult learners, are committed to their success, and are able to adapt their instructional methods for students without a high school diploma.

For Example: Palo Verde College (PVC) in California started with a **broad review** to examine its programs' labor market demand, internal performance, and the experiences of adult learners in the community. Once the team identified some potential pathways, they conducted a more **detailed review**, which included considering factors such as enrollment stability, completion patterns, transition potential, wage growth, employer need, student interest, and accessibility for adult learners (e.g., faculty experience with adult learners, availability of counseling services). Ultimately, PVC selected its **Alcohol and Drug Studies program** to be its first ECPP because of the following:

- Alignment with regional market trends;
- Consistent enrollment, student persistence, and course success outcomes;
- Program accessibility for a wide range of learners, including working adults and incarcerated students;
- Planned expansion into online course offerings, further increasing access;
- Formal agreement with a local employer, which provides structured practicum placements and a clear employment pipeline;
- Evidence of growing student interest in behavioral health careers; and
- An identified career ladder in behavioral health roles.

For Example: Santa Ana College in California chose its **Chassis Service Option Certificate** because it includes a number of features that make it an attractive, accelerated pathway for adult learners. First, the Chassis Service Option Certificate is a short-term, direct-to-workforce skill development certificate that can stack into an associate's or bachelor's degree in automotive technology.

Second, the content of the first course in the credit pathway, AUTO 102, is mirrored in a course available through the noncredit division, making it accessible to adult learners enrolled in the college's noncredit high school diploma or equivalency programs. If a noncredit learner then chooses to pursue the credit pathway, they will be able to earn credit for prior learning (CPL) for that first course. These mirrored courses allow Santa Ana College to leverage its robust adult dual enrollment pathways, which assists students enrolled in the high school diploma and equivalency program with completing credit coursework free of charge.

Lastly, the Santa Ana team sought a career pathway that aligned with ECPP requirements while not being so lengthy as to create a barrier for adult learners. They consulted with the CPL coordinator and learned that the noncredit and credit automotive technology programs already had a high level of collaboration. Further conversations with the faculty in both programs helped determine which certificate program was the best fit and value for adult learners. Additionally, labor market information confirmed that the projected earnings for the target occupation were significantly higher than the median wage in the area, and especially substantial for a non-degree credit certificate.

Submitting an ECPP for Federal Approval

Regardless of what ATB option an institution uses, according to federal regulation, the institution must submit documentation for at least one ECPP to ED for approval via the E-App, the Federal Student Aid portal used by institutions. As with all other aspects of ATB implementation, coordination and collaboration between the education departments and the financial aid office are recommended because each partner holds the expertise and knowledge essential to successful submission of the ECPP documentation. For example, while the institution is responsible for submitting the required documentation via the E-App portal, adult education, CTE, and/or academic services departments will be better able to compile the documentation.

As stated in federal regulation, once the first ECPP is approved, an institution may enroll ATB students in the ECPP as well as any other career pathway programs that meet the ECPP requirements. The regulations also indicate that institutions must provide a list of these other ECPPs to ED and certify that these programs meet the ECPP requirements. Although documentation for these additional programs does not have to be submitted for federal approval, it should be collected and verified internally in case of an audit or program review.

Compiling the Documentation

Since the required documentation addresses the career pathway and adult education components of an ECPP, institutional ATB implementation teams should consider relying on representatives from those departments to compile the documentation. In most cases, the representatives or departments will have compiled similar information for a state or institutional approval process or a grant proposal. For example, when proposing a new career pathway program or updating a curriculum, educators will usually research labor market data and consult with local industry advisors and workforce development agencies—all required as ECPP documentation.

For Example: At **Pima Community College** in **Arizona**, the adult education and I-BEST teams collaborated to gather the ECPP documentation for the college's IT Support Technician I-BEST program, much of which they had compiled to set up when launching the program initially. The legwork they did to compile the documentation led Pima's financial aid leadership to better understand and embrace ATB, reassuring them that they could move forward with ATB implementation. Pima's ECPP documentation for its IT Support Technician I-BEST program can be found in [Appendix D](#).

The [ATB Eligible Career Pathway Program Documentation Checklist](#) is a tool developed by World Education to help institutions ensure they have all the required ECPP documentation to submit to ED for approval. For each requirement listed in the regulations, the checklist provides a non-exhaustive list of examples of acceptable documentation, a space for institutions to list the documentation available to them, and a space for who to contact to locate the 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.

Each piece of documentation should be uploaded as a separate PDF. [Pima Community College's IT Support Technician I-BEST program application](#) is an example of acceptable documentation approved by ED. The college's financial aid office should consult their FSA eligibility analyst for instructions on file-naming.

Submitting the ECPP Documentation in the E-App

Once the ECPP documentation has been compiled, the institution should submit it via the E-App portal. The questions regarding ATB in the E-App can be confusing and should be answered as follows:

In the E-App, colleges should respond **yes** to both of the following questions about ATB:

Do you use an ability to benefit test for students who do not have a high school diploma or its recognized equivalent?

[Answer yes. In this case, *ability to benefit test* does not refer to the ATB test option, but rather the fact that the college administers (or plans to administer) ATB via any of the three options.]

Do you admit and enroll students through an eligible career pathway program?

[Answer yes, because under the current regulations, colleges must admit and enroll ATB students through an ECPP. Colleges will submit the ECPP documentation for approval in subsequent screens.]

Colleges enrolling students via an ATB state process should also upload a copy of their state's approved state process.

A set of annotated screenshots of the ECPP submission process in the E-App can be found in [Appendix D](#).

Key Takeaways

- ATB learners must enroll in an ECPP, enabling them to work towards completing a high school credential and earn a postsecondary credential at the same time (unless enrolled prior to 7/1/2012).
- Regardless of what ATB option an institution uses, the institution must submit documentation for at least one ECPP to ED for approval via the E-App.
- An ECPP must align with the definition of a career pathway as outlined in WIOA, Perkins V, and the Higher Education Act.
- When selecting an ECPP, there are numerous factors to consider that rely on input, information, and data from a variety of sources.

Resources

The U.S. Department of Education is committed to making its electronic and information technology accessible to individuals with disabilities in accordance with Section 508 of the Rehabilitation Act. However, the Department assumes no responsibility for the accessibility of third-party websites or external documentation referenced via hyperlinks within this toolkit.

The [ATB Eligible Career Pathway Program Documentation Checklist](#) from World Education helps colleges build cross-departmental collaboration and ensure that they have the ECPP documentation required to submit to ED for approval.

For more details on the ECPP documentation requirements and process, see *B. Eligible Career Pathway Program (34 CFR § 668.157)* in [\(GEN-24-08\) Ability to Benefit State Process and Eligible Career Pathway Programs](#).

For more details about the wording of the questions in the E-App, see [\(GENERAL-24-151\) Applying for Title IV Approval of an Eligible Career Pathway Program for Ability to Benefit](#).

For further information about the E-App, see [Application for Approval to Participate in Federal Student Financial Aid Programs User Reference Guide](#), from Federal Student Aid, an ED office.



Implementing ATB at the Institutional Level

ATB Implementation Teams

At the core of ATB implementation is cross-collaboration across a variety of institutional departments and units. This collaboration is essential for establishing the processes, workflows, and standard operating procedures that guide every step.

While specific roles and titles will vary across institutions, below are non-exhaustive examples of the types of roles that ATB implementation team members will have in designing and implementing ATB workflows. The team's composition will vary at different junctures of the work. For example, once the overarching workflows for implementing ATB have been established and launched, the team could be reconfigured to focus on operationalizing ATB and supporting ATB students' journeys. The team's composition and roles will also depend on which ATB option(s) is being implemented.

Title	Role
Team Conveners	- Recruit ATB implementation team members. - Provide basic information about ATB and its benefits for the institution, community, and learners. - Coordinate the work of team members and any subcommittees in defining and documenting the processes and systems for implementing ATB.
Adult Education	- Provide data on the potential pool of ATB-eligible learners. - Familiarize team members with a general profile of the strengths, needs, and education and career goals of adult learners working towards a high school diploma or equivalent. - Contribute to identifying ECPPs that are a good match for the pool of adult learners. - Gather documentation on adult education services for the ECPP approval process. - Identify potential ATB students and advise them on ATB eligibility requirements and ECPP options. Refer students to the institution's admissions and financial aid offices, following established procedures and ATB workflows. - Identify a staff member (often a student advisor or navigator) who will be the primary point of contact to track and support ATB students as they enroll in the career pathway and continue working toward their high school diploma or equivalent. - Identify potential funding sources to cover student tuition for the first six credits, if implementing the credit-hour option.
Career Technical Education/Career Pathways	- Participate in the ECPP selection process by providing program data, curriculum information, and recommendations of programs that would be a good fit for ATB learners. - Gather the documentation needed for the ECPP approval process. - Ensure that career advisors and navigators recruiting potential ATB students have up-to-date information about the program(s), pathway(s), and employment opportunities to inform students' program selection. - Ensure alignment of ATB student interests, skills, and readiness with ECPPs. - Identify potential funding sources to cover student tuition for the first six credits, if implementing the credit-hour option.
Financial Aid	- Submit the ECPP documentation provided by other team members as part of the ECPP approval process. - Contribute to developing a workflow and communication process to ensure that potential ATB students meet financial aid eligibility criteria and enrollment requirements. - Process financial aid for ATB learners and track student compliance.
Testing and Assessment Center	- Administer federally approved tests for ATB, if implementing the test option. - If implementing the state process option, the center may play a role in assessing student readiness as outlined in the state process.

Title	Role
Admissions	• Contribute to developing a workflow and communication process to ensure that ATB students successfully complete the institution's application and enrollment process.
Student Services	• Provide academic support and counseling and refer ATB students to other needed support services in coordination with adult education staff.
Institutional Research	• Track and report ATB student outcomes annually. • Identify any needs for revising institutional data collection or coding to identify, track, and report on outcomes for ATB students.
Marketing and Communications	• Develop a comprehensive communications and outreach strategy for promoting ATB as an option for adults on campus and in the community.



ATB Planning and Implementation Stages

While the following planning and implementation stages illustrated in **Figure 2** are not necessarily sequential or linear, they represent major benchmarks in the process of preparing to implement ATB.

The *Getting Ready to Implement ATB: Planning Tool* found in [Appendix E](#) was developed for colleges preparing to implement the state process option, but it can be adapted for colleges preparing to implement any of the three ATB options.

Figure 2. Getting Ready to Implement ATB



1. Establishing Shared Understanding and Vision

In this preliminary stage, the ATB implementation team should establish a shared understanding of what ATB is and a shared vision for how it will serve the institution and its learners. At a minimum, this team should include adult education providers or representatives, financial aid staff, CTE staff, and student services staff. Because the financial aid office will ultimately be responsible for securing federal student aid and ensuring regulatory compliance, it is critical to engage financial aid staff from the start for any ATB efforts.

These foundational activities should be designed to build team buy-in and to strengthen existing collaboration, systems, and the recognition of adult learners' potential as successful college students.

For Example: The Director of Financial Aid initiated the ATB implementation team at **Palo Verde College** in **California**. She brought the team together by emphasizing their shared goals of increasing student access, completion, and workforce outcomes. Equipping the team with concrete information, such as program structure (workflows), student profiles (statistical data on age groups in their area without a high school diploma), and enrollment projections, helped team members buy in to ATB.

When **Pima Community College** in **Arizona** launched its ATB team, it built on strong partnerships between adult education, CTE, and student services. In realizing the vision of supporting co-enrollment and accelerated career pathways for adult learners, the team was able to build on the already established collaboration, systems, and understanding of adult learners as college students to implement ATB successfully. The work from then on was about expanding that shared understanding within Pima so that the team could build a strong and sustainable system for ATB.

"Involve financial aid early, respect compliance concerns, and be open to adjusting program design to meet Title IV requirements. ATB works best when it is a college-wide commitment, not a single-office initiative."

2. Finding Common Ground and Shared Commitment

The ATB implementation team should jointly assess capacity and resources to make decisions about roles and responsibilities and to strengthen existing systems and processes that support implementation. This includes determining who will lead the development of a formal ATB implementation process and identifying additional team members.

For Example: The Assistant Vice Chancellor of Adult Basic Education for College & Career was the initial convener of the ATB implementation team at **Pima Community College**. Adult education has driven ATB at the college, but she notes that the stronger their team has become, the more each and every person on the team has become an advocate and a spokesperson for ATB and its benefits for both students and the college.

She emphasized that collaboration is key and requires having the right people at the table to give input into the ATB systems and processes, which cut across so many units and departments. It is also important to have a defined purpose, ensure each member's role is clearly defined, and get collective input on the proposed systems and processes.

3. Identifying an ECPP

In this critical stage, ATB implementation teams will need to identify potential ECPPs, select an initial ECPP, and prepare for the ECPP approval process. Throughout this stage, all ATB implementation team members should build an understanding of the federal requirements for the ECPP approval process. They should also examine regional and local data relevant to ECPP selection, including but not limited to student interest and labor market information.

Typically, the team members representing adult education and CTE or academic services will select the ECPP and gather the documentation that the financial aid office will upload for approval. More details on selecting ECPPs and the ECPP approval process can be found in the section [Eligible Career Pathway Programs](#).

For Example: The ECPP selection and decision-making process at **Laney College** in **California** involved faculty, staff, administrators, and community and industry partners, ensuring a comprehensive review of program strengths and long-term sustainability. Laney chose its Electrical/Electronics Technology program because it already met all ECPP requirements. Its combination of strong labor market need, sustained student demand, robust industry backing

(which provided work-based learning opportunities and pipelines to employment), committed faculty experts, and broad community support made the program the most immediately viable to launch first.

The team also learned the importance of having strong and well-structured advisory boards: maintaining active, representative membership and facilitating meaningful, industry-informed discussions have been essential in keeping the Electrical/Electronics Technology program aligned with workforce needs and ready for this next step of expansion to ATB learners.

4. Coordinating Student Services

The ATB team should establish protocols and procedures to ensure students will receive academic and career counseling services. These services must assist students in pursuing their credentials and obtaining jobs aligned with skill needs, as outlined in the ECPP requirements. Institutions implementing the state process option will also need to ensure that students receive any additional support services as required under their state's process.

For Example: At **Northeast Wisconsin Technical College**, the adult education navigator acts as a central point of contact for student recruitment and enrollment. They also provide case management services to prevent students from getting lost as they move between different departments. In collaboration with a cross-functional team—comprising adult education, admissions, financial aid, the Northeast Wisconsin Technical College Education Foundation, student support services, and assessment centers—the adult education navigator is able to provide a seamless, college-wide support network. Once an ATB student enrolls in college courses, the navigator makes a referral to academic coaching and informs faculty that the student is dually enrolled in adult education. Their role is to help the student connect to any additional services needed. By designating specific departmental liaisons and facilitating direct appointments with financial aid advisors, the college ensures that students do not have to navigate complex administrative systems on their own. With regular navigator check-ins, students receive ongoing support and the expert guidance necessary for postsecondary success.

5. Identifying ATB Students

The ATB implementation team should establish student eligibility criteria aligned with the federal ATB requirements and any additional criteria the state or institution has identified based on the ATB option(s) being implemented. Once the criteria are confirmed, the ATB team should draft protocols and workflows for identifying, screening, and referring potential ATB students to financial aid. Initially, the process will likely focus on identifying existing adult education students who are citizens or eligible noncitizens, who are interested in pursuing postsecondary education. However, the team may also leverage partnerships with employers, non-credit workforce programs, admissions, and community-based organizations to identify adults who have not completed high school yet and are interested in furthering their educational opportunities.

For Example: The adult education program at **Northeast Wisconsin Technical College** introduces ATB during different stages of the student's journey. During program orientation, the program shows a video about ATB and explains that students have options for starting postsecondary education without having to wait until they have their high school diploma or equivalent. To identify adult education students who may be eligible for ATB, the adult education career advisors talk with new students working towards their high school diploma or equivalent about available career pathways, IET, and ATB-eligible programs. Students then complete a career assessment to inform their decision-making process. Instructors also talk with students about their education and career goals and invite the advisor to classes to talk about the options. [This flow chart](#) describes the referral process.

For Example: At **Pima Community College**, a dedicated adult education program advisor is a member of the ATB implementation team. They serve as a bridge between the adult education students who may be ATB-eligible and the financial aid team. The ATB team provides training for both financial aid and adult education staff on how to advise students on federal student aid and ATB.

6. Tracking ATB Students

The ATB implementation team should draft protocols and workflows to guide the process for tracking ATB students who will be dually enrolled in adult education and credit-based career pathways programs. It is important to communicate regularly and have systems in place to share progress updates and changes in enrollment status with financial aid and all relevant departments.

For Example: Pima Community College's adult education student services team took the lead on engaging admissions, the registrar's office, the testing department, and financial aid to create a student workflow for ATB. They worked closely with the registrar's office to create a process for updating student admissions records. They also ensured that their ECPPs were coded correctly in the catalog to align with degree audit rules in full compliance with federal ATB requirements.

The collaboration enabled the team to set up procedures for documenting the ATB student journey and standard operating procedures across multiple units and departments. They also developed new ways to capture student details in their Banner Student Information Systems ("Banner"). These procedures helped the college to ensure that ATB students were maintaining their eligibility over the course of the program.

7. Collecting and Reporting Data

The ATB implementation team should draft protocols for collecting and reporting the required student data, depending on the ATB option(s) implemented by the college. This may include changing the current data systems and operationalizing the specific reporting requirements under the state process, where applicable.

For Example: At Pima Community College, the IT department developed a new screen in Banner specific to ATB students that allows them to code ATB students and structure their academic journeys in the system so that Banner only opens up the types of financial aid for which the students are eligible. Making these types of changes to systems required collaboration across multiple departments and units: financial aid, IT, and the registrar teams. The team also established single points of contact for specific pieces of information. For example, the adult education advisor serves as the single point of contact for all adult education student records, collecting student information from financial aid and testing and making sure that it is captured in the system from the start. The advisors then follow the students and update the systems to make sure that financial aid has the information they need to confirm that the student remains eligible for federal student aid from semester to semester.

8. Developing Marketing and Communication Strategies

As the team prepares to implement ATB, it should develop strategies and materials to recruit and refer ATB students. This will include engaging the communications and marketing departments, in partnership with adult education, workforce development, and community-based organizations, to design materials and develop coordinated recruitment strategies on campus and in the community. ATB should be promoted in ways that are attractive and meaningful to potential students and free of technical jargon.

For Example: Pima Community College does not talk about "Ability to Benefit" with students. What they sell are the career pathways programs and the wraparound supports that come along with them. College staff talk to potential ATB students about the different options available to help them pay for college, earn credentials, and reach their career goals more quickly.

For Example: Adult Options in Education, an adult education program in **Minnesota**, provides information for students about ATB on [its website](#). In addition to explaining ATB requirements in plain language and having a point of contact listed for next steps, the page features a promotional video on ATB that was developed by Whatcom Community College in Washington state, giving potential ATB students the opportunity to hear from ATB learners.

Key Takeaways

- Cross-collaboration across a variety of institutional departments and units is at the core of ATB implementation.
- Establishing a shared vision and understanding of the benefits and challenges of ATB implementation is an important foundation for the work.
- Coordination, communication, and clarity about roles and responsibilities are critical.
- Implementation teams should develop protocols and workflows for each stage in the ATB process.

Resources

- [Getting Ready to Implement ATB: Planning Tool \(Appendix E\)](#): This tool is designed to help ATB implementation teams track their progress, identify existing challenges and questions, and map out next steps.
- The Wisconsin Technical College System (WTCS) developed an [ATB User Guide](#) that includes a planning tool for colleges that includes internal and external considerations for implementing ATB. Colleges can use the tool as a self-assessment to support readiness, collaborative partnerships, and the development of a common approach to ATB implementation. The tool also provides advice for WTCS colleges on the types of members to include on an implementation team.
- A Conversation with Financial Aid Directors ([Appendix F](#)).

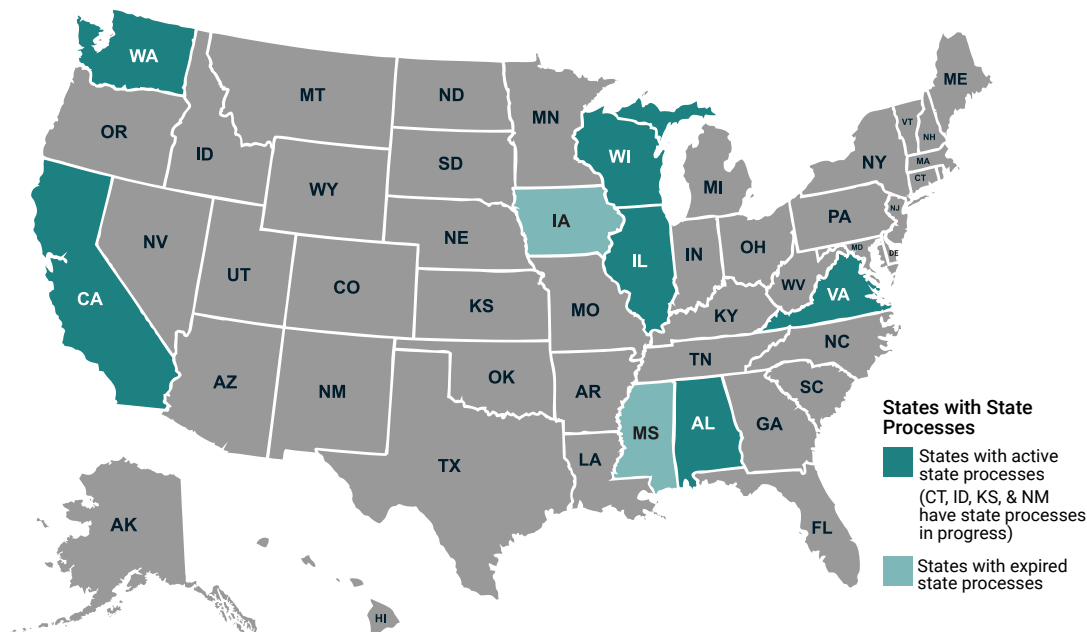


Developing an ATB State Process

While institutions can implement the test or credit-hour options independently, states can choose to maximize ATB impacts by implementing the third option: the state process. Under the state process option, states can define their own process for admitting ATB learners and submit it to ED for approval.

As of 2026, nine states have received federal approval for a state process (Figure 3): Alabama, California, Illinois, Iowa, Minnesota, Mississippi, Virginia, Washington, and Wisconsin. However, any state can choose to submit one.

Figure 3. States With State Processes



Benefits of the State Process Option

While the state process option requires ongoing administration and investment from the state, there are many benefits to implementing one.

The state process option gives states the ability to develop a customized process that leverages existing systems and structures, and addresses their unique needs. If intentionally implemented, it can also align ATB usage with statewide initiatives and goals related to career pathways, postsecondary education, and adult dual enrollment. The state process option also gives states more oversight and decision-making power, allowing them to maximize the impact of ATB implementation statewide.

At the same time, institutions in states with approved state processes are not limited to utilizing the state process option. Colleges retain the choice and flexibility to use the test and credit-hour options, with the state process providing an additional avenue to ATB learner enrollment.

For learners, the state process has the potential to accelerate their access to federal student aid by eliminating the following barriers:

- The academic challenges associated with the test option, which requires learners to pass a high-stakes standardized test
- The often-prohibitive costs of the credit-hour option, which requires learners or the college to pay for the qualifying six credits without federal student aid
- The significant time investment required of students to complete either of the above options

Table 3 shows why three states chose to implement a state process.

Table 3. Why Implement a State Process?

California	Washington	Wisconsin
California's state process builds off the success of Senate Bill 554 (2019), which allows adult learners to be enrolled as "special admit" dual enrollment students in community college. ATB is also highlighted in California's Master Plan for Career Education 2025 as a critical strategy for ensuring continued federal student aid access for adult learners.	In Washington, ATB was a natural next step after the success of its nationally recognized Integrated Basic Education and Skills Training (I-BEST) model, which provides contextualized instruction, wraparound supports, and navigational services. With the state process, adult learners can co-enroll in I-BEST and the state's competency-based High School+ program to accelerate their learning and workforce readiness. ¹⁰	In addition to leveraging Wisconsin's longstanding career pathways work, the state process aligns with Wisconsin's 60 Forward goal to increase the state's postsecondary attainment rate to 60% by 2027. ATB is also viewed as a means of closing critical gaps in education, credentialing, and earnings across the state. ¹¹

Convening an ATB State Team

To determine if a state process is the right fit for a state, the state should first convene a team of agencies and stakeholders. Depending on the state, this team may be referred to as a working group, task force, or steering committee. This toolkit will use the term *ATB state team*.

As the state decides to move forward with developing a state process, the team will inform critical decision-making, draft the initial application, and lay the groundwork for successful implementation through systems and partnership building.

While each state is different, the convening entity typically has been the state's higher education agency, community college system office, or adult education office. Ideally, the state team will include the following:

- The state agency overseeing CTE
- The state agency overseeing federal student aid (e.g., the statewide governing body for higher education or other central system offices)
- The state adult education administrator overseeing the state's high school equivalency programs
- Staff responsible for developing relevant implementation policies
- State staff overseeing Student Information System (SIS) data collection, monitoring, and compliance
- Other statewide stakeholders, such as but not limited to the governor's office, correctional education leadership, and/or educational foundations
- Institutions with experience implementing ATB or interest in serving as early adopters of the state process
- Current ATB students or adult learners who could be eligible for ATB

It is critical for the ATB state team to decide who will be leading the work. The lead agency, typically the state's higher education agency or community college system office, will be responsible for keeping team members informed about and updated on ATB, assigning roles and responsibilities, and ensuring progress and accountability as the state process evolves. The lead agency will likely also take on the responsibility of 1) submitting the state process to ED and 2) leading implementation efforts once the state process is approved.

¹⁰ Washington State Board for Community and Technical Colleges, *Washington's State Defined Process for Ability to Benefit*, 2023. <https://www.collegetransition.org/wp-content/uploads/2023/08/Washington-State-Defined-Process-for-Ability-to-Benefit-2023.pdf>

¹¹ Konruff, Ben. 2025. "DEAL State Team Cohort Session 1." Virtual DEAL Cohort Session, June 26, 2025.

“Start with your community college presidents. Doing a presentation, maybe during their board meetings, or getting in front of them will help them understand the importance of ATB, how it is a resource to their students, how it can help with enrollment, all of those things. And then ask them if they could suggest or select a representative to be a part of a larger state team.

Once we got the colleges on board and identified key stakeholders from the colleges, then the work really began. We started to have meetings with some of our key partners, like the CTE deans and directors, our adult directors, our financial aid directors and assistants, individuals from the business office and admissions, and institutional research. Make sure that each person that you’ve identified as a partner knows about all aspects of ATB. Sometimes you will have to write steps down, do an informational sheet, or have something tangible to give them.” (*Nikitna Barnes, Mississippi Community College Board*)¹²

Building the Foundation for a State Process

Before committing to the development of a state process, the ATB state team must determine whether the state process is the right fit for their system and adult learners. The team should consider the following questions:

- What is the level of knowledge and understanding of ATB and the state process among team members? If there is little to no knowledge and understanding, what is the team’s interest in ATB and the state process?
- How does ATB implementation align with the state’s goals, priorities, and initiatives?
- Do any institutions in the state currently use ATB? What is their experience with ATB implementation?
- Have any institutions in the state previously used ATB? Why are they no longer using ATB?
- What is the team’s experience building cross- and multi-sector partnerships for career pathways initiatives?
- Who else should be represented on the team and/or will be needed to move forward with this decision-making process?

The next step is to determine the state’s readiness to implement ATB statewide. The DEAL team found that high adopters of ATB were able to leverage past successes and current system structures and partnerships to springboard ATB implementation.¹³ The next section provides a non-exhaustive list of considerations for state working groups to work through as they lay the foundation for a successful state process together.

Building the Foundation for a Successful State Process

Intentional and sustained systems

Thoughtfully designed systems with a strong internal infrastructure that allows states and institutions to effectively identify, enroll, support, and track potential and current ATB learners.

Considerations

Does the state have...

- Sufficient staffing and systems in place to address the additional administrative workload required to develop and administer a state process?
- A system in place to review college-level data on ATB implementation?
- A system in place to provide information, guidance, and support to colleges?
- Informational and professional development convenings for college administrators and staff?

¹² Barnes, Nikitna. 2025. “DEAL State Team Cohort Session 3.” Virtual DEAL Cohort Session, August 21, 2025.

¹³ The team conducted an unpublished landscape scan on ATB usage nationwide, which identified promising practices and key challenges among states and institutions with high rates of ATB adoption.

Alabama: Because Alabama community colleges have long been champions of the test and credit-hour options, the Alabama Community College System (ACCS) already had mechanisms in place to track and report ATB students within its data system when it began discussing the state process option. As a result, developing a state process-specific tracking code was a simple and efficient undertaking, requiring only minor modifications to existing reporting structures. Additionally, in 2018, ACCS implemented a comprehensive overhaul of its student management and data reporting processes through OneACCS to ensure consistency, accuracy, and efficiency across all colleges. The standardized nature of the OneACCS system allows ACCS to seamlessly track ATB participants and easily meet the reporting and monitoring requirements established under the state process.¹⁴

Wisconsin: “After receiving approval for our ATB state process option, we knew that change was required to support its implementation. We hosted three regional convenings that brought college staff together to discuss ATB and its benefits, and also provide time for sensemaking and planning for potential implementation. This convening was not a one-and-done offering: our office continues to provide ongoing support to the field. For example, we host a quarterly ATB community of practice that brings together financial aid staff and adult education leaders to discuss experiences, challenges, and successes. It also provides a space for us at the system office to relay any federal changes or news from other states implementing ATB.” (*Ben Konruff, Wisconsin Technical College System*)¹⁵

Clear and collaborative partnerships

ATB partners must be driven by a shared vision and a sense of collective responsibility. Each partner’s role must be clear, and the work must be collaborative.

Considerations

Does the state have the ability and capacity to...

- Convene the relevant leaders and stakeholders for developing and implementing the state process?
- Draft roles and responsibilities for each partner responsible for ATB implementation at the state and institutional levels?
- Routinely share information, guidance, and templates for colleges to develop agreements or memoranda of understanding and to document alignment, roles, and commitments?

Kansas: To convene its ATB working group, the Kansas Board of Regents drew on the successful partnerships that it had previously developed through its [Accelerating Opportunity: Kansas](#) (AO-K) career pathways work. As the state began providing guidance to institutions on ATB implementation, A-OK also served as a critical foundation for the timely selection and submission of ECPPs.¹⁶

Pima Community College: “It’s important to iron out what each person’s roles are. As much as we might have drafted that early on in our cooperative agreement, sometimes we bumped up against something we didn’t think of early on. The biggest thing was to validate and honor what was unclear, come back to the table, and talk it out in our collaborator meetings.

“We had a big partner meeting on a regular basis that was big-picture, but we also needed our student services and workforce development specialists to come together regularly just to talk about their work, and we needed our instructional team and instructional leaders to come together regularly to just focus on those levels. So we had

¹⁴ Alabama Community College System. 2026. “DEAL Participation Materials.”

¹⁵ Konruff, Ben. 2025. “DEAL State Team Cohort Session 4.” Virtual DEAL Cohort Session, September 25, 2025. Presentation by Ben Konruff.

¹⁶ Kansas Board of Regents. 2026. “DEAL Participation Materials.”

partner-to-partner meetings at the most local and most focused level along with meetings at the big operations team level, and leader-to-leader meetings to check in.” (Laurie Kierstead-Joseph, Pima Community College)¹⁷

Mississippi: When the state process was approved, the Mississippi Community College Board (MCCB) developed several documents for institutions to use in implementation, including a compliance checklist to be kept in students’ files and a template for an ATB-specific memorandum of understanding. MCCB also leveraged partnerships with ED, the Center for Law and Social Policy, and other organizations to decide what guidance, best practices, and resources would work best for the state.¹⁸

Learner-centered approach

Critical to the success of ATB implementation is the belief from all partners that adult learners can succeed in postsecondary education without a high school credential.

Considerations

Does the state have the ability and capacity to...

- Convene leaders and stakeholders who are committed to supporting the success of learners without a high school diploma or equivalency?
- Support and promote alternative pathways to earning a high school diploma or equivalency?
- Support and promote alternative pathways to postsecondary credential attainment for learners without a high school equivalency?
- Support and promote multiple and alternative methods for assessing college readiness and course placement?
- Develop and implement a marketing strategy for raising public awareness of ATB?
- Provide information, guidance, and templates to colleges to support their marketing and recruitment efforts?
- Provide information and guidance to colleges to support their efforts to collect direct feedback from students?

Virginia: As the Virginia Community College System began to develop its state process, one of the goals that emerged was to leverage its success in implementing CPL across the state, such as its [Credits2Careers](#) portal. CPL enables Virginia’s community college students to earn academic credit for their work, military, and life experience, accelerating their postsecondary educational attainment. Through Virginia’s approved state process, an adult learner may demonstrate readiness for ATB by either accruing six credits through CPL as determined by VCCS or attaining a CPL-eligible industry-recognized credential at a Virginia community college.¹⁹ (Note that while CPL cannot be used under the credit-hour option, states may propose alternative means for assessing ATB readiness under the state process.)

“We developed a common messaging document for folks on our ATB task force. This is what we used when we went out into the field to talk about ATB at all. If we were at instructional councils or vice president councils, we all had language that was in common. We made sure that we were speaking about ATB on one accord.” (Nicole Daughtry, Washington State Board for Community and Technical Colleges)²⁰

¹⁷ Kierstead-Joseph, Laurie. 2025. “DEAL State Team Cohort Session 3.” Virtual DEAL Cohort Session, August 21, 2025.

¹⁸ Barnes, Nikitna. 2025. “DEAL State Team Cohort Session 3.” Virtual DEAL Cohort Session, August 21, 2025.

¹⁹ Virginia Community College System. 2026. “DEAL Participation Materials.”

²⁰ Daughtry, Nicole. 2025. “DEAL State Team Cohort Session 4.” Virtual DEAL Cohort Session, September 25, 2025.

“The majority of students that we serve through ATB are non-traditional, low-income students. In order for them to be successful in their programs, we needed to have funding for student support services. So having buy-in and developing partnerships with our funders were very important for us. We would invite our funders to come to our internal and external ATB trainings so that they could better understand and hear from the colleges some of the challenges and strengths related to ATB implementation.

“We also did a lot of presentations to different state agencies, like the Office of Vocational Rehabilitation, the Mississippi Department of Human Services, and the Mississippi Department of Employment Security, so that we could build those state-to-state partnerships.” (Nikitna Barnes, Mississippi Community College Board)²¹

Resources

- **ATB State Team Self-Assessment:** This self-assessment tool, developed by the DEAL team, supports state teams in identifying strengths and gaps in existing state initiatives, systems, partnerships, and learner-centered approaches so ATB practices can be developed, improved, and incorporated into a robust state-defined process that meets federal requirements. The self-assessment’s results are not meant to deter states from moving forward but to inspire ideas for action plans that will guide state teams in developing their state-defined processes and subsequent applications. See [Appendix G](#).

The State Process Application

To receive approval for a state process, the state must submit an initial application to ED, following the requirements outlined in [\(GEN-24-08\) Ability to Benefit State Process and Eligible Career Pathways Programs](#). When the initial 2-year approval period ends, the state must then submit a subsequent application to continue using the state process. All state process applications, as well as any questions about the state process, must be directed to atbstateprocess@ed.gov.

Initial Application

The initial application for a state process must include:

1. A list of the postsecondary institutions participating in the state process
2. An overview of the requirements participating institutions must meet to utilize the state process
3. An overview of the eligibility criteria for students participating in the state process
4. A certified statement affirming that all career pathway programs in which ATB students will be enrolling meet the requirements for ECPPs
5. A statement affirming that each participating institution’s undergraduate student withdrawal rate is no more than 33%
6. Certified statements for each of the following:
 - a. How the state will ensure that the number of students enrolling via the state process during the initial period will be no more than 25 students or 1% of the participating institution’s total enrollment, whichever is greater
 - b. That the state will monitor each participating institution’s compliance with federal requirements annually and require corrective action for noncompliance



²¹ Barnes, Nikitna. 2025. “DEAL State Team Cohort Session 3.” Virtual DEAL Cohort Session, August 21, 2025.

- c. That the state will, if an institution refuses or fails to comply with federal requirements, terminate the institution from participating in the state process and prohibit participation for at least 5 years²²

In the list of participating postsecondary institutions, states should include all institutions that have expressed interest (or may potentially be interested) in participating in the state process. Being included on the list does not commit an institution to participating in the state process, but institutions must be on the list to participate. If the state chooses to submit a subsequent application, this list can be updated at that time.

If ED does not respond to a state's initial application within 6 months, the process is considered approved by default. The initial approval period is 2 years, after which states must reapply for approval. If a state does not enroll any students via the state process during the initial 2-year period, ED may grant approval for a third year.²³

Resources

- For further details about the initial application, including the recent changes to the regulations, see A. *Requirements for State Process Applications* in [\(GEN-24-08\) Ability to Benefit State Process and Eligible Career Pathway Programs](#).
- Links to the initial state process applications for the nine states with approved state processes can be found in the *Resources for States* section. Note that the majority of these initial applications were submitted prior to the recent regulation changes in 2024 and include information no longer required in the current initial application, such as a description of required student services and a calculation of the state's initial success rate.
- **ATB State Process Action Plan Template:** This tool supports ATB state teams in identifying roles, responsibilities, and timelines with regards to drafting the state process. See [Appendix H](#).

Subsequent Application

Following the 2-year initial period, the state must submit a subsequent application to continue using the state process. States should plan to submit the subsequent application well before the end of the 2-year initial period to ensure there are no interruptions in using the state process.

The subsequent application must include:

1. A list of the postsecondary institutions participating in the state process
2. An overview of the requirements participating institutions must meet to utilize the state process
3. An overview of the eligibility criteria for students participating in the state process
4. A certified statement affirming that all career pathway programs in which ATB students will be enrolling meet the requirements for ECPPs
5. A statement affirming that for any new participating institutions, the institution's undergraduate student withdrawal rate is no more than 33%
6. Certified statements for each of the following:
 - a. That the state will monitor each participating institution's compliance with federal requirements annually and require corrective action for noncompliance
 - b. That the state will, if an institution refuses or fails to comply with federal requirements, terminate the institution from participating in the state process and prohibit participation for at least 5 years
7. The success rate for each participating institution (see *Success Rate* below)

²² U.S. Department of Education, 2024. (GEN-24-08) Ability to Benefit State Process and Eligible Career Pathway Programs. <https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2024-06-12/ability-benefit-state-process-and-eligible-career-pathway-programs>

²³ U.S. Department of Education, 2024. (GEN-24-07) Implementation of Regulations Related to Financial Responsibility, Administrative Capability, Certification Procedures, and Ability to Benefit (ATB) (Updated August 23, 2024) <https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2024-05-16/implementation-regulations-related-financial-responsibility-administrative-capability-certification-procedures-and-ability-benefit-atb-updated-august-23-2024>

8. A narrative of the economic circumstances for the typical student enrolling via the state process, including a description of successes and failures regarding participating students' overall educational attainment and what could be improved, as well as the numbers of participating students at each participating institution by race, gender, age, economic circumstances, and educational attainment²⁴

Subsequent applications can be approved for up to 5 years.

If a state process expires, students who were admitted prior to the expiration will still be eligible for federal student aid. However, participating institutions will not be able to enroll any new students until ED approves a subsequent application.

For more details about the initial application, see section A. *Requirements for State Process Applications* in [\(GEN-24-08\) Ability to Benefit State Process and Eligible Career Pathway Programs](#).

Success Rate

As part of the subsequent application process, states must submit a success rate for each participating institution that was included on the initial application. The success rate ensures that students who are admitted via the state process experience educational outcomes comparable to students with a high school diploma or equivalent: it is a means of comparing the program completion, retention, and transfer outcomes of students admitted via the state process versus students with a high school diploma or equivalent in the same ECPP. Participating institutions must maintain a success rate of at least 85% to remain compliant, meaning that the success rate for state process students must be within 85% of the success rate of students with a high school diploma or equivalent.²⁵

For more details about how to calculate the success rate, see section B. *Success Rate Calculation Example* (34 CFR 668.156(f)) in [\(GEN-24-08\) Ability to Benefit State Process and Eligible Career Pathway Programs](#).

Drafting the State Process Application

While every state operates differently, the process of developing and drafting the state process application should generally include the following:

1. Convene an ATB state team of key stakeholders
2. Designate a lead on the development and drafting of the state process
3. Understand the requirements of ATB and the state process application
4. Build awareness of ATB and the state process statewide
5. Solicit input from the ATB state team, institutions, and other stakeholders
6. Draft the state process application
7. Review the state process application to ensure compliance with all requirements
8. Receive approval to submit the state process application, if needed

"We pulled together a team of adult education staff and financial aid staff, because we knew those were the two pieces that were going to be essential in getting the state plan put together. We put a call out to the state for who wants to be involved. We had more adult education representatives than financial aid, but we did try to get four or five financial aid people from across the state. We broke into subcommittees to divide up the plan, and we pulled from the ED website the requirements you have to have for each piece. We assigned pieces to subcommittees, compiled them all, and sent the draft back out to the whole group for review, questions, and comments.

We started that process in March of that year, and we were able to submit a final draft in November. It took longer than I wanted to because of some internal processes at our state level: we had the plan done in August, but it took us a little bit more to get the approval piece that we needed. Keep that in mind if there are pieces that require approval so you can get through that." (Angela Gerberding, Illinois Community College Board)²⁶

²⁴ U.S. Department of Education, (GEN-24-08).

²⁵ U.S. Department of Education, (GEN-24-08).

²⁶ Gerberding, Angela. 2025. "DEAL State Team Cohort Session 4." Virtual DEAL Cohort Session, September 25, 2025.

“We had our adult education state director, our high school equivalency and GED state director (who works in our K–12 system), and the Department of Public Instruction on our team. We had our internal policy associates, who provided a rich history of ATB at that time, and the student services directors in our office. We included the state director of CTE, who was involved in Perkins. We also invited some staff from our colleges to be on the steering committee because we wanted to hear from our colleges their perspectives on the state option and how it would help support them.

So, we developed our initial application, it was submitted in 2019, and we were denied for the following reason: ‘We failed to explain how the state will monitor compliance with the process and describe how the state will require corrective action.’ So we regrouped, and we included staff in our office who work in the assessment, compliance, and data world, and our strategy and improvement director. They helped to map out what the monitoring process would look like for the state option and how we had to change our data infrastructure to support that work. We updated that application and received approval in 2020.

We also require our colleges to sign a memorandum of understanding if they’re going to engage in the state process as well. This requires them to participate in required professional development throughout the year, detail to us all of the eligible career pathway programs they’ll be seeking approval for through ED, and commit to supplying any of the required data to calculate the success rate.” (Ben Konruff, Wisconsin Technical College System [formerly])²⁷

“We had to build that relationship between financial aid and adult education from scratch. There has been a feeling of, ‘If you build it, will they come?’ And so we’d hear from a lot of folks, when they’d look at the amount of work, they’d say, ‘Who are we talking about? Who and where are these students?’ One thing I think that, early on, we could have done was an ATB roadshow: showing up at the Financial Aid Council meetings; showing up at the Council for Basic Skills meetings and trying to get time even on the Instruction Commission meetings, where you’ve got your vice presidents and where you really need that top leadership buy-in.” (Nicole Daughtry, Washington State Board for Community and Technical Colleges)²⁸

Key Takeaways

- The state process option for ATB gives states the ability to develop a customized process that leverages current systems, structures, and strengths; addresses unique needs; and aligns ATB usage with statewide initiatives and goals.
- The state process option also accelerates adult learners’ access to federal student aid by eliminating the time and financial costs associated with the test and credit-hour options.
- The ATB state team is typically convened by the state’s higher education agency, community college system office, or adult education office. It should comprise the state agencies overseeing CTE; federal student aid; high school equivalency; SIS data collection, monitoring, and compliance; and other statewide stakeholders.
- Before committing to developing and implementing a state process, states should consider the strengths and systems they can leverage to intentionally implement and sustain ATB usage, drive the cross-agency partnerships that are critical to the work, and center the adult learner experience.
- To receive approval for a state process, the state must submit an initial application to ED in compliance with federal requirements. The initial approval period is 2 years, after which the state must submit a subsequent application in order to continue using the state process.
- State processes have additional federal requirements beyond those for the test and credit-hour options, such as each participating institution needing to meet an 85% success rate.

²⁷ Konruff, Ben. 2025. “DEAL State Team Cohort Session 4.” Virtual DEAL Cohort Session, September 25, 2025. Presentation by Ben Konruff for DEAL State Team Cohort Session 4, September 25, 2025.

²⁸ Daughtry, Nicole. 2025. “DEAL State Team Cohort Session 4.” Virtual DEAL Cohort Session, September 25, 2025.



State Support for Institutions Implementing ATB

All states, regardless of whether they have an approved state process, can support ATB implementation and expansion in various ways. The following suggestions are meant to be a starting point and are non-exhaustive.

Build awareness of ATB across the state. While there is growing interest in ATB across the country, many institutions continue to have little or no knowledge of ATB and the opportunities it presents. This lack of knowledge is compounded by the changes in ATB regulations over the years, as institutions may have lingering misconceptions about ATB (e.g., the belief that ATB was never restored following its rescission in 2012). Providing clear, concise information about ATB and its benefits, especially concrete examples of what ATB implementation looks like on the ground, is a crucial first step in generating interest.

For Example: While every state has set a different timeline for implementation, many of the six states participating in DEAL have presented to key stakeholders to start building awareness prior to the submission and approval of an ATB state process. The **Kansas state team** has developed shared files and information for financial aid officers as guidance for navigating the ECPP submission process.²⁹

Connect ATB to existing state and institutional goals and initiatives. Highlighting the connections among ATB, adult dual enrollment, career pathways, and serving adult learners will help institutions understand *why* they should consider implementing ATB. States can help draw explicit connections to demonstrate how ATB is aligned to current goals and initiatives at the state and institutional levels. For example, in some states, ATB is a natural complement to current state efforts on expanding IET. For some institutions, ATB builds upon longstanding community college reforms under the [guided pathways](#) model.

Host regular meetings for institutions implementing (or interested in implementing) ATB. Once institutions have started implementation activities (or are strongly considering implementation), regular meetings can provide a much-needed space for peer learning and sharing. In addition, the state may share changes to federal policies, promising practices from other states, and other relevant news and updates. These meetings may also support the state and institutions in retaining knowledge and expertise in the case of staff turnover.

For Example: If a state is implementing a state process, these meetings will be important for kicking off the state process, building awareness and garnering buy-in, establishing a shared vision and goals, and laying the foundation for successful implementation. After **Wisconsin** received approval for its state process, the Wisconsin Technical College System hosted three regional convenings for colleges to discuss ATB, its benefits, and the state process and provide time for sensemaking and planning for implementation. The system office continues to host a quarterly ATB community of practice that brings together financial aid and adult education staff to share their experiences and challenges and to stay updated on ATB-related news.³⁰

Issue clear, concise advice regularly and promptly. Formally sharing information about news and updates related to ATB on the federal, state, and institutional levels is essential to keep everyone informed and sustain institutional knowledge in case of staffing changes. This advice can come in multiple forms. For example, the California Community Colleges Chancellor's Office issued a formal [memo](#) to announce the approval of its state process, share resources, and ask participating institutions to submit a letter of intent. In Washington, the State Board for Community and Technical Colleges created a list of frequently asked questions for participating institutions.

²⁹ Kansas Board of Regents. "DEAL Participation Materials."

³⁰ Konruff, Ben. 2025. "DEAL State Team Cohort Session 4." Virtual DEAL Cohort Session, September 25, 2025. Presentation by Ben Konruff.

For Example: For states implementing a state process, the state should consider compiling detailed guidance and tools in a user guide or toolkit, providing participating institutions with a go-to resource as they begin implementing ATB. Developing a set of common tools will also help maintain standardization across institutions. As one example, the **Wisconsin Technical College System's** [Ability to Benefit User Guide](#) includes a primer on ATB and its benefits, guidance for developing an institutional ATB steering committee, an ATB planning tool for institutions, sample forms, and a list of frequently asked questions.

Collaborate with other state-level agencies. Regardless of the state entity providing support for statewide implementation, the work cannot be done alone. The lead or convening agency must communicate and collaborate with other relevant state agencies to ensure the work is understood and sustained at all levels. For example, if a state's adult education office is spearheading ATB work but is part of the state's department of education or labor, the office must partner with the state's higher education system to ensure successful uptake. These state-level partnerships may also provide critical insights on mitigating the different perspectives and concerns that adult education providers, financial aid officers, and CTE leaders bring to ATB at the institutional level.





Promising Practices in ATB Implementation

In addition to the examples highlighted throughout this toolkit, this section highlights promising practices for ATB implementation. To support states and institutions in adopting and scaling ATB usage, the DEAL team identified attributes, or metrics, of states and institutions with high rates of ATB adoption.³¹ We also included conditions necessary to successfully begin and sustain ATB implementation at the state and institutional levels.³² Additionally, these metrics were matched with relevant challenges and corresponding promising practices that high adopters have implemented. The attributes, challenges, and practices belonged to the following three categories:

- **Intentional and sustained systems** that allow adopters to effectively identify, enroll, support, and track potential and current ATB students.
- **Clear and collaborative partnerships** that are grounded in a shared vision and sense of collective responsibility.
- **A learner-centered approach** driven by the belief that adult learners can succeed in postsecondary education without a high school diploma or equivalent.

The DEAL team has developed the [ATB State Team Self-Assessment \(Appendix G\)](#) for state teams interested in implementing ATB. This self-assessment aligns with the metrics presented within these three categories. The promising practices described in the subsequent sections provide institutional and state teams with strategies to meet the high adopter metrics.

Intentional and Sustained Systems

Whether implementing ATB at the state or institutional level, it is crucial to have thoughtfully designed systems with a strong internal infrastructure, inclusive of processes and people, allowing states and institutions to effectively identify, enroll, support, and track potential and current ATB students. High adopters have been able to successfully leverage past successes and system structures to springboard their implementation, as shown in **Figure 4**.

Figure 4. Intentional and Sustained Systems Metrics

The adopter does the following:

- Clearly communicates the value of ATB in general and as it relates to its specific context(s).
- Establishes a shared interest with partners in serving adult learners through ATB.
- Designates staff to implement all components of its ECPP(s) (e.g., academic and career counseling services).
- Allocates sufficient resources to address the additional administrative workload required to implement ATB. This includes data collection, monitoring, and reporting responsibilities if the adopter is a state that has implemented a state process.
- Sets up a data system to identify ATB students and collect all the required data.
- Identifies at least one existing career pathway program that would be of interest to and suitable for ATB learners.
- Leverages ongoing promising practices and innovations related to ATB implementation (e.g., I-BEST, competency-based diplomas) and is committed to pursuing opportunities that would maximize the benefits for ATB learners in its specific context.
- Creates ECPP(s) as part of an intentional career pathways system, with multiple entry and exit points for learners.

³¹ Based on an unpublished landscape scan on ATB usage nationwide, the team identified key challenges and corresponding promising practices among states and institutions with high rates of ATB adoption.

³² The term **adopter** refers to cross-functional ATB implementation teams at the institutional level or cross-agency ATB leadership teams at the state level who support colleges in their efforts to expand ATB usage locally. In all cases, the metrics and characteristics they reflect are applicable to institutional and state strategies for adopting and expanding ATB use.

- Pursues sustainable funding to support anticipated ATB learners before they become eligible for federal student aid (e.g., funding to cover the cost of the six credit hours for ATB learners who are pursuing the credit-hour option).
- Connects with ED and is tuned into new regulations or other updates regarding ATB.
- Puts a plan in place to sustain ATB implementation in the case of staff turnover.

In undertaking these high-adopter metrics, providers encountered several challenges to sustaining intentional systems for implementing ATB, including:

- **Unfunded administrative burdens:** Adopters at varying levels of implementation point out the lack of incentives to adopt and scale ATB usage. For states implementing a state process, there is no additional funding to support the administrative burden of assisting participating institutions or for monitoring and data collection. For institutions implementing ATB, there is rarely additional funding to redevelop processes and workflows to include ATB, convene and maintain an ATB implementation team, and collect and submit additional data.
- **Staff turnover:** Adopters cite staff turnover as one of the biggest challenges to ATB implementation, underscoring the need for ATB to be seen as a systemwide effort rather than the cause of one or two champions. When these champions leave, adopters report feeling as if ATB implementation must start all over again, with new staff who may be unfamiliar with ATB.
- **Student recruitment:** While multiple states cited potential pipelines of students in their state process applications, recruitment efforts have been more difficult than anticipated.

In efforts to mitigate the effects of these challenges, high adopters have implemented the following promising practices:

- **Career pathways initiatives:** Of the nine states that have had an approved state process, eight explicitly referred to past or current examples of successful career pathways initiatives in their initial or subsequent applications. For example, California, Minnesota, and Washington all leverage the [guided pathways](#) model. The successes and effectiveness of these initiatives, as well as the connection between career pathways and ATB implementation, helped support buy-in and uptake for multiple states. Statewide implementation of career pathways initiatives may help ease the transition to the new ECPP approval process. Institutions that have developed career pathway programs, such as guided pathways and IETs, will likely have data, such as labor market information, that they can use for their ECPP application.
- **State support for participating institutions:** Five out of nine states (Illinois, Minnesota, Mississippi, Washington, and Wisconsin) with an approved state process indicated in their applications that they would provide regular, ongoing support to participating institutions. However, the form of support (e.g., TA, professional development, and training) varies from state to state. In addition, multiple states have developed resources for their institutions to use in implementation, such as Wisconsin Technical College System's [Ability to Benefit User Guide](#) and Minnesota State Colleges and Universities' [ATB partnership checklist](#).
- **Dual enrollment:** In California, ATB is explicitly connected to adult dual enrollment. The state passed [Senate Bill 554](#) in 2019, enabling adults in GED® or high school equivalency certificate programs to simultaneously enroll in community college as special part-time students. In addition, the state's [College and Career Access Pathways grant](#), which allows institutions to offer free pathways-based dual enrollment programming for high school students, has encouraged colleges to make their other dual enrollment programming free as well. Career Ladders Project, an organization advancing adult dual enrollment in California, also braids ATB and adult dual enrollment in its ATB toolkit, [Transitioning Adult Learners to College: A User Guide for Ability to Benefit and Adult Dual Enrollment](#).
- **Braided funding for learners:** High adopters of ATB have identified additional sources of funding to support potential or current ATB learners, enabling learners to maximize the benefits of their federal student aid. For example, states and institutions that heavily rely on the credit-hour option may use state financial aid or scholarships (Washington, California), WIOA Title I funding (Pima Community College), WIOA Title II funding (Wisconsin), or private foundation funding (Mississippi) to cover the cost of the six credits for potential ATB learners.

Clear and Collaborative Partnerships

To successfully implement ATB usage, the ATB team must be driven by a shared vision and sense of collective responsibility. As highlighted in **Figure 5**, each partner's role must be clear, and their work must be collaborative.

Figure 5. Clear and Collaborative Partnerships Metrics

- The adopter has connections to and explicit commitment from the appropriate internal partners, such as admissions and financial aid offices.
- The adopter has a connection to and explicit commitment from an adult education provider.
- Partners are committed to sharing a clear vision and goals for ATB implementation. They understand the communicated value of ATB in general and as it relates to their specific context(s).
- Partners are willing to share a sense of collective responsibility for ATB learners.
- Partners are willing to consistently and reliably carry out collectively defined roles and responsibilities.

There are challenges to convening an ATB implementation team and maintaining clear and collaborative partnerships for implementing ATB.

- **Siloed institutions:** While some institutions may have a more collaborative culture, other institutions highlighted the siloed nature of their departments and have disconnects among key players such as admissions and financial aid.
- **Increased burden on staff:** Leading and participating in a well-functioning collaboration takes time and effort on top of already full workloads. Without additional funding or incentives to support the ongoing administrative workload, it is challenging to sustain an ATB implementation team. Further, it can be challenging to engage the financial aid office, given that the task of submitting the ECPP for approval lies with them.
- **Different Motivations:** While access and affordability are commonly cited as reasons to implement ATB, each stakeholder might have different motivations for implementing ATB, given their role in the institution. It can be challenging for ATB implementation team conveners to communicate the importance of ATB in a way that is compelling to various stakeholders and persuades them to join the effort.
- **Unclear roles and responsibilities:** The lack of clear messaging can contribute to a lack of shared vision, collective sense of responsibility and accountability, and clarity around each partner's roles and responsibilities. The Minnesota State Department of Education developed the [Minnesota State ATB Partnership Checklist](#) to highlight responsibilities among ATB partners.
- **Financial aid partnerships:** It can be particularly challenging to engage financial aid officers in ATB implementation for a variety of reasons, including workload and capacity, misinformation about ATB, and concerns about compliance with federal regulations.

High adopters relied on two key promising practices to address these challenges:

- **Workforce partnerships:** In alignment with their career pathways initiatives, partnerships with workforce partners can lead to improved services for ATB recipients. For example, Pima Community College collaborates with its WIOA Title I partner (ARIZONA@WORK—Pima County) and the institution's CTE department to design and deliver I-BEST programming and provide employability training, employer visits, and job search services.³³
- **Creating an ATB team:** To mitigate the siloed nature of departments and sustain support for ATB, high adopters aim to build an ATB team that is cross-departmental. For states, the team members are discussed in detail in the section entitled *Convening a State Team*. For institutions, this may include staff from the following departments: adult education, admissions, financial aid, and CTE. Institutional staff may want to review the section entitled *ATB Implementation Teams* for more guidance on establishing ATB teams at the college level.

³³ Pima Community College, "Outline of Cooperative Partner Roles for Logistics and Supply Chain Management Integrated Basic Education and Training (Logistics IBEST)," accessed January 6, 2025. <https://www.collegetransition.org/wp-content/uploads/2022/08/Cooperative-Partner-Roles-Logistics-IBEST-.docx>

Learner-Centered Approach

A learner-centered approach to ATB is one that is grounded in the belief that adult learners can succeed in postsecondary education without a high school diploma or equivalent. Strategies in this area should directly address adult students' concerns about affordability, access, and their ability to navigate postsecondary education. **Figure 6** highlights the key metrics for a learner-centered approach.

Figure 6. Learner-Centered Approach Metrics

The adopter has the following:

- Belief in the ability of ATB learners to be college students and is committed to serving them.
- An intentional strategy for recruiting ATB learners, including drawing on identified pipelines and using marketing materials and language that resonate with learners.
- Support and services in place to sufficiently meet ATB learners' holistic needs.
- Plan to support ATB learners in a) identifying the right ATB option for them, and b) identifying and applying for other appropriate sources of financial aid.
- Clear process for collecting feedback from learners on their ATB student experience, including sharing success stories and concerns.

There are several challenges to adopting a learner-centered approach to ATB implementation as well, including:

- **Misconceptions of adult students:** Some stakeholders may be unfamiliar with adult education students and skeptical about their capabilities and readiness for postsecondary education, without having attained a high school diploma or equivalency certificate.
- **Messaging to potential ATB students:** The term *Ability to Benefit* is confusing and does not resonate with potential ATB students. Also, the term does not describe, in an accessible way, who might be eligible and how they would benefit from ATB. Some adopters use the term *dual enrollment* instead, but this term is not universally understood either.
- **Addressing students' basic needs:** As housing instability, food insecurity, and other financial and basic needs increase, it is even more critical to increase access to federal student aid. However, not all institutions are equipped to address these needs through the support services they offer or through referrals to community resources.

High adopters have addressed these challenges through the following promising practices:

- **Shared recognition of adult students as college students:** Adopters recognize that ATB students, although dually enrolled in adult education, are legitimate college students. As such, they should be eligible for the same benefits and resources as any other college student, and, as with any student, the entire institution must be collectively invested in their success.
- **Student navigators:** Student navigators can support ATB students with their academic, career, and basic needs, enabling them to successfully integrate into the college system. In Mississippi, for example, community colleges rely on navigators to support ATB learners with the intake process and FAFSA® completion, and track student progress towards educational and career milestones. The navigators are also able to help learners assess their readiness for ATB and identify which ATB option is best for them.³⁴
- **State policy and planning that supports adult learners:** Approaches to state policy that promote adult learners' potential invites support for ATB among state postsecondary systems and local institutions. For example, California passed Senate Bill 554 in 2019, which explicitly supports adult dual enrollment, enabling adults in GED® or high school equivalency certificate programs to simultaneously enroll in community college as special part-time students. Other states address adult learners in their higher education strategic plans: the Missouri Department of Higher Education and Workforce Development's *Sixty for All* plan for adult learner postsecondary attainment discusses leveraging the

³⁴ Barnes, N. 2024. "Interview for the Dual Enrollment for Adult Learners project."

state's Fast Track financial aid program³⁵ to increase ATB usage and calls for policy reform to give justice-involved learners access to state financial aid.³⁶

Key Takeaways

- **State and college administrators sustain successful ATB efforts through building intentional and sustained systems** that allow adopters to effectively identify, enroll, support, and track potential and current ATB students, **establishing clear and collaborative partnerships** grounded in a shared vision, and **taking a learner-centered approach** with the core belief that adult learners can succeed in obtaining their high school diploma and participating in postsecondary education.
- The **ATB State Team Self-Assessment** aligns with these metrics and provides state administrators with a tool to assess strengths and determine areas for continued improvement in preparing for and implementing ATB across a state.

³⁵ Missouri Department of Higher Education and Workforce Development. (n.d.). *Fast Track Workforce Incentive Grant*. <https://dhewd.mo.gov/initiatives/fast-track-workforce-incentive-grant>

³⁶ Education Strategy Group. (2023). *Sixty for all: A roadmap to ... postsecondary attainment for adult Missourians*. Missouri Department of Higher Education and Workforce Development. <https://dhewd.mo.gov/media/pdf/missouri-adult-learner-strategic-plan>



Conclusion

The ATB provision in the Higher Education Act gives eligible adults without a high school diploma or equivalent access to federal student aid. ATB expands adult learners' access to postsecondary education and federal student aid, which supports postsecondary enrollment, retention, and completion rates for adult learners. Dual enrollment in adult education and postsecondary education can accelerate adult learners' credential attainment, preparing them for in-demand, well-paying jobs and meeting the demand for trained workers in high-growth industries and occupations.

To learn more about implementing ATB at your institution, review the sections [Understanding the ATB Eligibility Requirements](#) and [Implementing ATB at the Institutional Level](#), as well as [Getting Ready to Implement ATB: Planning Tool \(Appendix E\)](#). For state administrators interested in implementing or supporting ATB usage statewide, review the sections [Developing an ATB State Process](#) and [State Support for Institutions Implementing ATB](#).

While ATB implementation can be a complex endeavor, institutions and states can leverage existing strengths to put into place the intentional and sustained systems, clear and collaborative partnerships, and learner-centered approach critical to successful ATB utilization and expansion. Successful ATB implementation depends on not only regulatory compliance, but also sustained institutional collaboration and a unified commitment to expanding educational and economic opportunities for adult learners.



Resources

This section provides a quick reference to resources that may be helpful to states, institutions, and other stakeholders in ATB implementation. It includes the resources listed throughout this toolkit, as well as additional resources.

The U.S. Department of Education is committed to making its electronic and information technology accessible to individuals with disabilities in accordance with Section 508 of the Rehabilitation Act. However, the Department assumes no responsibility for the accessibility of third-party websites or external documentation referenced via hyperlinks within this toolkit.

For Colleges, Institutions, and States

DEAL Resources

Getting Ready to Implement ATB: Planning Tool: This tool, developed by the DEAL team, is designed to help ATB implementation teams at colleges track their progress, identify existing challenges and questions, and map out next steps. See [Appendix E](#).

For States:

ATB State Team Self-Assessment: This self-assessment tool, developed by the DEAL team, supports state teams in identifying strengths and gaps in existing state initiatives, systems, partnerships, and learner-centered approaches so ATB practices can be developed, improved, and incorporated into a robust state-defined process that meets federal requirements. The self-assessment's results are not meant to deter states from moving forward but to inspire ideas for action plans that will guide state teams in developing their state-defined processes and subsequent applications. See [Appendix G](#).

ATB State Process Action Plan Template: This tool, developed by the DEAL team, supports ATB state process working groups in identifying roles, responsibilities, and timelines with regards to drafting the state process. See [Appendix H](#).

Ability to Benefit: Understanding New Processes, Resources, and Guidance: This DEAL webinar from January 2025 highlights the 2024 regulatory changes to ATB.

Federal Guidance and Resources

(GEN-24-08) Ability to Benefit State Process and Eligible Career Pathway Programs: This Dear Colleague Letter, published on June 12, 2024, details changes made to the ATB state process regulations at 34 § 668.156 and the addition of regulatory requirements for ECPPs at 34 CFR § 157. It includes a breakdown of how to calculate the ATB success rate for the state process and a list of examples

of acceptable documentation for institutions to submit during the ECPP approval process.

(GEN-24-151) Applying for Title IV Approval of an Eligible Career Pathway Program for Ability to Benefit: This Electronic Announcement, published on December 23, 2024, clarifies the submission process for institutions submitting their ECPPs for ED approval in the E-App.

Application for Approval to Participate in Federal Student Financial Aid Programs: User Reference Guide: This reference guide provides instructions for completing all aspects of the E-App, including the sections on ATB.

Federal Student Aid Handbook: The Federal Student Aid Handbook includes the Application and Verification Guide. ATB information can be found in Volume 1, Chapter 1 (Student Eligibility) of the most current edition.

List of Approved Ability to Benefits [sic] Tests: This Federal Register Notice, published on May 27, 2025, includes updated guidance on the ATB tests currently approved by the U.S. Secretary of Education.

For States:

Analysis of Ability to Benefit Usage: This analysis, conducted by ED in 2022, describes data on the number of students who qualified for and received federal student aid through ATB between 2016 and 2021.

Other Resources

Please review the [Disclaimers](#) listed on the Acknowledgements page before using the information provided.

ATB Eligible Career Pathway Program Documentation Checklist: This tool, developed by World Education, helps institutions ensure they have all the required ECPP documentation to submit to ED for approval. For each requirement listed in the regulations, the checklist provides a non-exhaustive list of examples of acceptable documentation, a space for institutions to list the

documentation available to them, and a space for who to contact to locate the documentation.

Ability to Benefit User Guide: Developed by the Wisconsin Technical College System, this user guide helps colleges understand ATB and the steps required to successfully align college services with local and regional stakeholder partners. The user guide includes a planning tool for colleges that includes internal and external considerations for implementing ATB, a checklist for the state process option, and a template for an ATB student agreement.

Ability to Benefit State Process Partnership Checklist:

Developed by the Minnesota State Colleges and Universities system, this document is a checklist for a partnership between Minnesota State college and adult basic education representatives. It outlines agreements necessary for a successful collaboration, focusing on student success and an ongoing relationship.

Transitioning Adult Learners to College A User Guide for Ability to Benefit and Adult Dual Enrollment:

This guide, developed by the Career Ladders Project, helps adult schools and community colleges work in partnership to implement ATB and adult dual enrollment. It includes multiple tools to successfully align adult education and college services, as well as templates for ATB student agreements.

Boost Financial Aid Access: Harness Ability to Benefit Changes to Support Adult Learners: The National Council for Workforce Education and World Education co-hosted this webinar in January 2025 to review the recent regulatory changes to ATB. The Washington State Board of Community and Technical Colleges shared how it planned for these changes, as well as how it is harnessing ATB alongside the state's I-BEST model and SNAP Employment & Training to support ECPP implementation and reduce basic needs insecurity.

Implementing Ability to Benefit and Career Pathways to Support Adult Learners' Transitions to Postsecondary Education and Beyond: This implementation-focused webinar from World Education describes how Northeast

Wisconsin Technical College and Pima Community College leverage ATB and career pathway programs together to effectively support adult learners during their transition into their postsecondary journey and beyond. The [slide deck](#) is also available.

Steps for Utilizing/Expanding Ability to Benefit (ATB) Use at Washington State Community & Technical Colleges:

This template from the Washington State Board for Community and Technical Colleges breaks down the steps required to implement ATB at the institutional level in Washington state.

The Unsung Student Aid Option: A College Leader's Guide to Implementing the Credit-Hour Ability to Benefit Provision in the Federal Student Aid Program:

Developed by Corporation for a Skilled Workforce, this how-to guide provides information about implementing the credit-hour option in community colleges.

Approved State Process Applications: This list includes the initial state process applications for the nine states with approved state processes. *(With the exceptions of Alabama and Virginia, these initial applications were submitted prior to the recent regulation changes in 2024 and include information no longer required in the current initial application, such as a description of required student services and a calculation of the state's initial success rate.)*

- [Alabama](#) (2026)
- [Virginia](#) (2026)
- [California](#) (2024)
- [Minnesota](#) (2022)
- [Illinois](#) (2021)
- [Mississippi](#) (2021)
- [Washington](#) (2020)
- [Iowa](#) (2019)
- [Wisconsin](#) (2019)

Appendix A. Frequently Asked Questions (FAQs)

Question: I thought ATB could no longer be used to provide federal student aid. Has that changed?

Answer: This is a common misconception. While ATB was eliminated in 2012, it was fully reinstated with some changes in 2016, and further updated in 2024.

Question: Are adults who are enrolled in English for Speakers of Other Languages (ESOL) classes at an adult education program but not pursuing a high school equivalency eligible for ATB?

Answer: No. ATB students must be working towards their high school diploma or equivalent.

Question: Are adults who already have a high school diploma but are taking adult education, job training, or other such courses eligible for ATB?

Answer: No. ATB students must be working towards their high school diploma or equivalent. Students with high school diplomas are generally eligible for Title IV aid without ATB, if they meet all other federal student aid eligibility requirements, including requirements related to U.S. citizenship or eligible noncitizen status.

Question: How would an institution check that a current ATB student is fulfilling the adult education enrollment requirements necessary to maintain ATB eligibility?

Answer: This question underscores the importance of regular, ongoing collaboration between adult education, dual enrollment, and financial aid partners to develop the appropriate processes and protocols for ATB implementation. Institutions have the flexibility to decide what this process would look like for them.

Question: As a financial aid officer, where do I find all the documentation required for the ECPP approval process?

Answer: It is unlikely that a financial aid officer (or any one person at an institution) will have access to all the documentation required for the ECPP approval process. This requirement underscores the critical nature of partnerships with adult education, dual enrollment, and CTE to ATB implementation, as these stakeholders will most likely have the context and documentation required for the ECPP approval process.

Question: How should I answer the questions about ATB in the E-App?

Answer: Any institution that uses ATB, regardless of which ATB option they use, must answer “yes” to both questions about ATB in the E-App. See this [Electronic Announcement](#) for further details on how to interpret and answer the two questions.

Appendix B. Comparison of ATB Options

	State Process Option	Test Option	Six-Credit Option
Student Eligibility	Student demonstrates eligibility by meeting the requirements stated in the ATB state process.	Student demonstrates eligibility by passing one of the approved ATB tests.	Student demonstrates eligibility by earning six credit hours or 225 clock hours towards a Title IV degree or certificate.
Oversight	Option is overseen by a state entity.	Option can be independently implemented by institutions.	Option can be independently implemented by institutions.
Eligible Career Pathway Programs (ECPP)	Student is required to be enrolled in an ECPP unless they were registered or enrolled in any eligible program prior to July 1, 2012. ¹		
Student Services	Requires specific student services as defined in the ECPP requirements, as well as any additional student services listed in the ATB state process. ²	Requires specific student services as defined in the ECPP requirements.	Requires specific student services as defined in the ECPP requirements.
Data and Reporting	Requires reporting of ATB student enrollment, completion, retention, and transfer data to the state entity in order to calculate the institution's success rate.	Requires reporting of ATB student enrollment and completion to the U.S. Department of Education to the extent usually required for Title IV eligible programs.	Requires reporting of ATB student enrollment and completion to the U.S. Department of Education to the extent usually required for Title IV eligible programs.
Success Rate	Institution must demonstrate a success rate of 85% or higher.	Not Applicable.	Not Applicable.

¹ For more information see DCL GEN 12-09. <https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2012-06-28/gen-12-09-subjecttitle-iv-eligibility-students-without-valid-high-school-diploma>

² For more information see DCL GEN 12-08. <https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2024-06-12/ability-benefit-state-process-and-eligible-career-pathway-programs>

Appendix C. Comparison of Career Pathways, ECPPs, and IET Programs

	Career Pathways	ECPPs	IET Programs
Concurrent Components	(D) Includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster. (E) Organizes education, training, and other services to meet the specific needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable.	(1) The student has enrolled in or is receiving all three of the following elements simultaneously. (i) A Title IV eligible postsecondary program as defined in 34 CFR 668.8 (among other criteria, the program must be a minimum of 15 weeks and at least 600 clock hours, 16 semester or trimester hours, or 24 quarter hours). (ii) Adult education and literacy activities under the WIOA 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. (iii) Workforce preparation activities as described in 34 CFR 463.34;	(a) Adult education and literacy activities as described in § 463.30. (b) Workforce preparation activities as described in § 463.34. (c) Workforce training for a specific occupation or occupational cluster which can be any one of the training services defined in section 134(c)(3)(D) of the Act.
Workforce Alignment	(A) Aligns with the skill needs of industries in the economy of the state or regional economy involved.	(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: (i) Government reports identifying in-demand occupations in the State or regional labor market. (ii) Surveys, interviews, meetings, or other information obtained by the institution regarding the hiring needs of employers in the state or regional labor market. (iii) Documentation that demonstrates direct engagement with industry.	As part of a career pathway, an IET should be informed by and align with the regional and state industry skills needs.
Supports Transitions to Postsecondary Education and Careers	(B) Prepares an individual to be successful in any of a full range of secondary or postsecondary education options. (C) Includes counseling to support an individual in achieving their education and career goals. (G) Helps an individual to enter or advance within a specific occupation or occupational cluster.	(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. (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. (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.	(b) The IET program is part of a career pathway.
Credential Attainment	(F) Enables an individual to attain a secondary school diploma or its recognized equivalent, and at least one recognized postsecondary credential.	(6) The program is designed to lead to a valid high school diploma as defined in § 668.16(p) or its recognized equivalent.	As part of a career pathway, an IET should enable an individual to attain a secondary school diploma or its recognized equivalent, and at least one recognized postsecondary credential.

Appendix D. Instructions for ATB Questions in E-APP

This appendix features images of Section K of the E-App that financial aid officers will fill out when submitting their institution's ECPP for approval.

Interpret the question "Do you use an ATB test..." to mean "Do you intend to implement ATB?". Since you are submitting an ECPP with the intention of implementing ATB, answer "yes" regardless of which ATB option(s) you are implementing.

Section K. Ability to Benefit

1. Do you use an ability test for students who do not have a high school diploma or its recognized equivalent? *

- ☒ Yes
☐ No

Select the ability to benefit test(s) administered. Contact FSA if your ability to benefit test is not identified in this list. *

ACCUPLACER Computer-adaptive tests (Reading Test, Writing Test, and Arithmetic Test) ▼

- ☐ Combined English Language Skills Assessment (CELSA), Forms 1 and 2.
- ☒ ACCUPLACER Computer-adaptive tests (Reading Test, Writing Test, and Arithmetic Test)
- ☐ COMPANION ACCUPLACER Forms J and K (Reading Test, Writing Text, and Arithmetic Text)
- ☐ Texas Success Initiative (TSI) Assessment Computer-adaptive tests (Reading Placement Test, Writing Placement Test, and Arithmetic Placement Test)
- ☐ COMPANION TSI Forms T and V (Reading Placement Test, Writing Placement Test, and Arithmetic Placement Test)
- ☐ Completing at least six credit hours, or the equivalent coursework (225 clock hours), that are applicable toward a degree or certificate offered by the institution.
- ☐ Completing a State process approved by the Secretary.

Check all the ATB options you intend to implement. In the example below, the college is only implementing the test option using the ACCUPLACER.

Colleges that indicate that they are enrolling students through a federally approved ATB state process will be prompted to upload a copy of their state's approved process.

Eligibility Application

Reason for Submitting

General Information

Accreditation & State Authorization

Owners, Officials & Administrators

Locations & Educational Programs

Additional Factors & Details

Third-Party Servicer

8 Ability to Benefit

Section K. Ability to Benefit

Provide the name and address of your ATB Test Administrator(s)

Select + **Add New** to add a new Test Administrator. To edit information about an existing Test Administrator, click the edit icon.

Name of Test Administrator	Name of Test	Effective Date
	ACCUPLACER Computer-adaptive tests (Reading Test, Writing Test, and Arithmetic Test)	2/18/2026

Previous

This college is administering the ACCUPLACER to assess ATB eligibility and is prompted to provide information about the test administrator(s).

Eligibility Application

Reason for Submitting

General Information

Accreditation & State Authorization

Owners, Officials & Administrators

Locations & Educational Programs

Additional Factors & Details

Third-Party Servicer

8 Ability to Benefit

Administrative Capability

Title IV Programs

Additional Contacts & Information

Uploaded Documents

Submit eApp

Section K. Ability to Benefit

Provide the name and address of your ATB Test Administrator(s)

Test Administrator *
Select

Personal Information

Prefix -optional
Select

First Name *
Enter Name

Middle Name -optional
Enter Name

Last Name *
Enter Name

Suffix -optional
Enter Name

Business Information

Business Name *
Business Name

Country *
United States

Business Address 1 *
Enter Address

Business Address 2 -optional
Enter Address

City *
Enter City

State/Territory *
Select

Zip Code *
Enter Number

+4 -optional
Enter Number

Contact Information

Email Address *
Enter Address

Telephone Number *
+ 1 000 000 0000
Ext. -optional
Enter

Fax Number *
No items to show
+ New Identity
Ext. -optional
Enter

Eligibility Application

✓ Reason for Submitting

✓ General Information

✓ Accreditation & State Authorization

✓ Owners, Officials & Administrators

✓ Locations & Educational Programs

✓ Additional Factors & Details

✓ Third-Party Servicer

8 Ability to Benefit

Section K. Ability to Benefit

2. Do you admit and enroll students through an eligible career pathway program? *

☒ Yes

☐ No

Previous

 Save Draft

Next

Although your ECPP will be considered pending until approved, you must answer "yes" to the question "Do you admit and enroll..." because all ATB students must be admitted and enrolled through an ECPP.

At this juncture, you will upload each of the PDF files that make up the ECPP application, as outlined in the [ATB Eligible Career Pathway Program Documentation Checklist](#), or the guide provided to you by your Eligibility Analyst, if applicable.

Eligibility Application

- Reason for Submitting
- General Information
- Accreditation & State Authorization
- Owners, Officials & Administrators
- Locations & Educational Programs
- Additional Factors & Details
- Third-Party Servicer
- 8 Ability to Benefit

Section K. Ability to Benefit – Upload File

You must upload the documents listed below to successfully submit your application or provide an explanation for why the document is missing. To provide an explanation click the “+new” button and select the Document Type you cannot provide, then indicate you cannot provide the document you use the description text box to explain why.

Once the document is uploaded, the document will display in the table below. Please contact Federal Student Aid if you have any issues uploading documents.

Select **+Add New** to add a new document.  Download Icon to download a document, and  Delete Icon to delete a document.

+ Add New

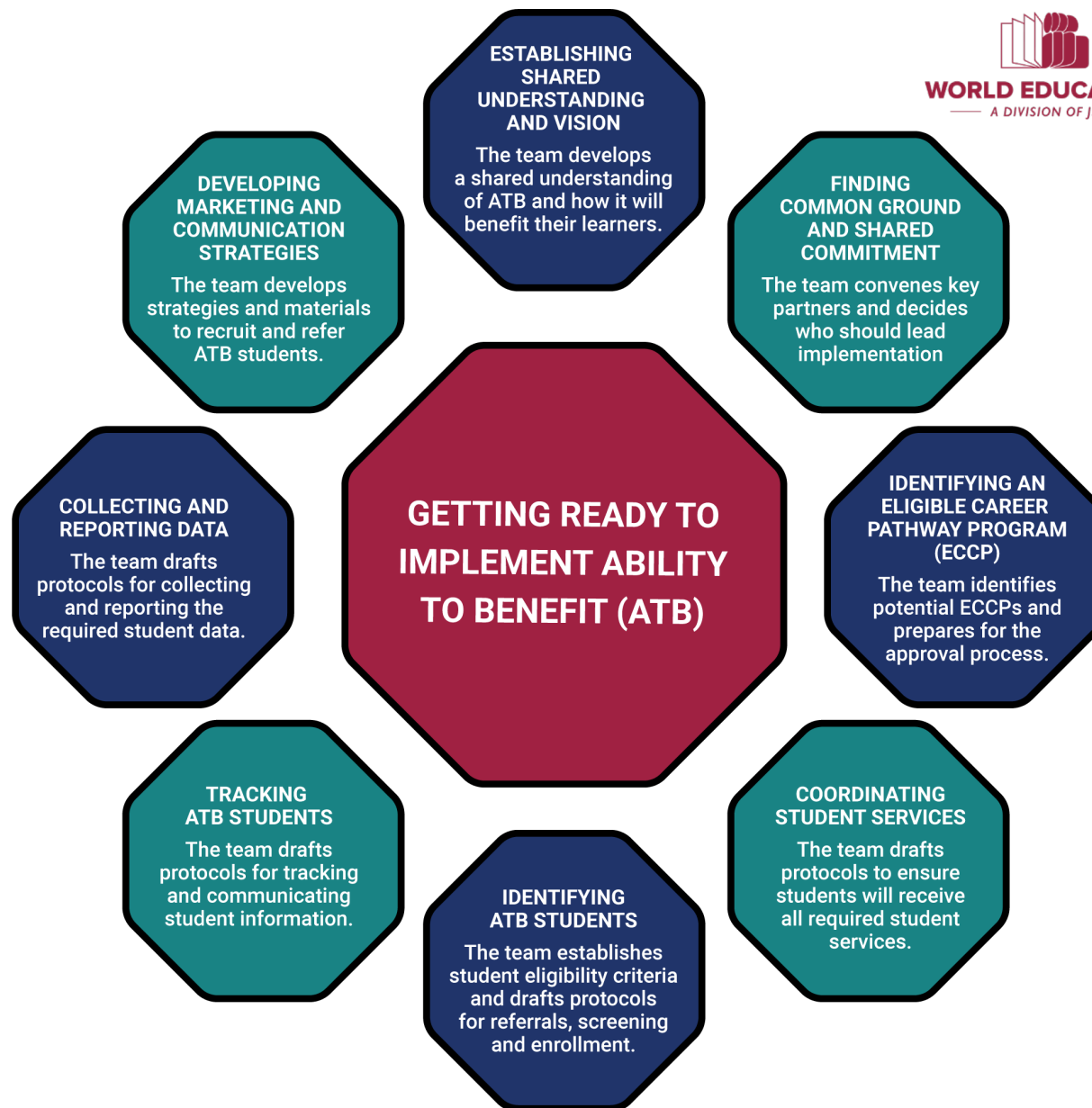
Document Type	Description	File Name	Upload Date	Uploaded By	File Size	File Type	Download	Delete
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Appendix E. Getting Ready to Implement an Ability to Benefit (ATB) State Process: Planning Tool

This planning tool outlines the stages colleges must complete to (a) establish a cross-functional, cross-departmental team for Ability to Benefit (ATB) implementation and (b) develop processes and workflows for ATB implementation under the state process. The tool is designed to help teams track progress, identify challenges and questions, and map out next steps.

The Getting Ready to Implement ATB: Planning Tool was developed for colleges preparing to implement the state process option, but it can be adapted for colleges preparing to implement any of the three ATB options.

The stages represent major benchmarks in the process of preparing to implement ATB. Although they are numbered in the pages that follow, they are not necessarily sequential or linear.



Planning Tool Instructions

Note: Ideally, all ATB implementation team members will contribute to each section of the planning tool. However, recommendations for input from specific team members whose perspectives are critical to successful implementation are included for each section.

- 1. Discuss the numbered activities.
- 2. Use the checkboxes to note where the college is in terms of progress for each activity.
- 3. Note any key efforts toward each activity to date, where applicable.

1. Establishing Shared Understanding and Vision

Input from all ATB implementation team members is recommended.

1. Ensure all team members have an up-to-date understanding of federal ATB requirements. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:

2. Ensure all team members have an up-to-date understanding of your state's ATB process (pending its finalization). ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:
3. Discuss the specific populations of current and potential students who can benefit from ATB. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:

4. Discuss and articulate how implementing ATB can benefit specific departments as well as the college as a whole. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:

2. Finding Common Ground and Shared Commitment

Input from all ATB implementation team members is recommended.

5. Confirm the ATB implementation team includes, at minimum, representatives from adult education, financial aid, and career and technical education (CTE) or credit-based career pathways. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:

6. Designate a team member to lead or coordinate the development of a formal ATB implementation process. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:

3. Identifying an Eligible Career Pathway Program (ECPP)

Input from adult dual enrollment, CTE, and financial aid team members specifically is recommended.

7. Ensure team members have an understanding of the federal requirements and the required documentation for submitting an ECPP for approval to the U.S. Department of Education. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:

8. Identify data the college can use from current career pathway programs in the consideration of potential ECPPs (e.g., enrollment and completion numbers, length of programs). ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:
9. Draw on regional and local labor market data to help identify potential ECPPs. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:

10. Analyze additional data, as available, to help identify potential ECPPs that would be a good fit for adult learners without a high school diploma or equivalency (HSD/E). ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:
11. Identify the roles and responsibilities of the team members involved in identifying potential ECPPs and collecting the required documentation for the approval process. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:

12. Identify the team member who will take the lead on compiling the ECPP documentation and submitting it in E-App. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:

4. Coordinating Student Services

Input from student services team members specifically is recommended.

13. Ensure all team members have an understanding of the student services required to be provided to ATB students. These services, delineated in the federal definition of a career pathway, include, “counseling to support an individual in achieving the individual’s education and career goals” (Career Pathways Checklist). Counseling may include a. career assessment; b. academic and career counseling, planning, and navigation; c. academic support, including tutoring; d. social support, including referrals to resources and services; e. transition planning to employment or postsecondary education; and f. any additional services required under your state process (if any, pending finalization). ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:

14. Establish a process by which ATB students will be referred to and enrolled in the student services listed above. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:
15. Establish a process to track and confirm ATB student participation in required student services. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:

16. Identify the team members who will draft the workflow for coordinating student service referrals. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:
17. Establish the roles and responsibilities of the team members involved in designing and implementing this system ensuring ATB students receive all required student services. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:

5. Identifying ATB Students

Input from all ATB implementation team members is recommended.

18. Ensure all team members have an understanding of the student eligibility requirements for ATB (pending additional requirements included in the state process, once finalized). ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:
19. Identify specific populations on which to focus ATB recruitment efforts, based on local demographic data, partnerships, and programmatic priorities. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:

20. Identify the partnerships that can be leveraged or that need to be developed for the purposes of recruiting potential ATB students from specific programs or demographic groups. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:
21. Designate the team members who will draft the workflows for identifying, referring, screening, and enrolling ATB students who meet the following criteria: a. pursuing a high school diploma or equivalency, b. enrolled (or intends to enroll) in an ECPP, c. meets all federal student aid eligibility requirements, and d. meets any additional student eligibility requirements outlined in state process (if any, pending finalization). ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:

22. Establish the roles and responsibilities of the team members who will be involved in designing and implementing this system for identifying and enrolling ATB students. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:

6. Tracking ATB Students

Input from institutional research and data systems team members specifically is recommended.

23. Determine whether the current student information systems are sufficient to track and communicate ATB-related information that may be required (pending finalization of the state process), such as a student's a. ATB status, b. enrollment in an ECPP, c. enrollment in an HSD/E program, d. participation in required student support services, e. attainment of an HSD/E, or f. withdrawal from the ECPP. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:

24. Develop a process for tracking referrals of potential ATB students to financial aid. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:
25. Determine whether the current student information systems are sufficient to track and communicate ATB-related information that may be required (pending finalization of the state process), such as a student's a. ATB status, b. enrollment in an ECPP, c. enrollment in an HSD/E program, d. participation in required student support services, e. attainment of an HSD/E, or f. withdrawal from the ECPP. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:

26. Designate a team member to take the lead on drafting workflows for tracking and communicating the required information about ATB students. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:
27. Establish the roles and responsibilities of the team members who will be involved in designing and implementing the system for tracking and communicating student information. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:

7. Collecting and Reporting Student Data

Input from institutional research and data systems team members specifically is recommended.

28.Ensure all team members have an understanding of the ATB data collection and reporting requirements under the state process (once finalized). ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:
29.Develop a process for collecting and reporting the required data on ATB students who are enrolled via the state process. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:

30. Designate a subteam who will draft the necessary workflows to ensure the required ATB student data is accurate, up-to-date, and complete. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:
31. Establish the roles and responsibilities of the data subteam members who will be involved in designing and implementing this system for collecting and reporting ATB student data. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:

8. Developing Marketing and Communication Strategies

Input from all ATB implementation team members, plus the college's marketing and communications team, is recommended.

32. Establish the roles and responsibilities of the team members who will be involved in designing and implementing ATB marketing and communication strategies. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date: Challenges/Questions: Next Steps:
33. Establish the roles and responsibilities of the team members who will communicate with all relevant offices and departments to ensure they are informed about ATB and the workflows for referring potential ATB students. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date: Challenges/Questions: Next Steps:

34.Designate the team member(s) who will coordinate with the communications and marketing departments to develop appropriate materials for informing potential ATB students about ATB. ☐ Not yet begun ☐ Early progress ☐ Substantial progress ☐ Completed/resolved	Key Efforts to Date:
	Challenges/Questions:
	Next Steps:

Appendix F. A Conversation with Financial Aid Directors

Collaboration with financial aid offices is essential when putting ATB systems in place. Without this office's buy-in, commitment, expertise, and willingness to administer federal student aid via ATB, the implementation cannot happen. It is important that ATB team members across departments understand that along with the benefits of ATB for students and the college, there are regulatory and administrative concerns that come into play for financial aid partners.

Below are conversations with two financial aid directors who have been instrumental in initiating and sustaining ATB at their respective institutions.

- **Christina Dollinger** (CD) is the Director of Financial Aid at Palo Verde College in Blythe, California. She convened the ATB implementation team at her college and represented Palo Verde in an ATB community of practice offered by the California Community Colleges Chancellor's Office and facilitated by staff from World Education.
- **David Donderewicz** (DD), FAAC, is the Executive Director of the Office of Financial Aid and Scholarships at Pima Community College in Tucson, Arizona. He has been a key member of the ATB implementation team, which was initiated by leaders in the college's adult education and workforce programs.

The conversations with each financial aid director occurred individually but have been combined in the dialogue that follows.

What were your (or your financial aid colleagues') initial concerns about getting into ATB?

CD: Our initial concerns centered on compliance risk and workload. ATB is complex, and we were concerned about interpreting federal regulations correctly, documenting eligibility appropriately, and ensuring we could withstand audits or program reviews. There was also concern about capacity—ATB requires coordination across departments, and we wanted to be sure we had the staffing, training, and systems to manage it without negatively impacting other Title IV processing.

DD: In financial aid, we love to talk about calendars—specifically the academic calendar, semesters, and payment periods. Administering aid isn't just about pushing a button to disburse. It really requires setting up the calendar so you know which Pell formula to use. Other areas of the college don't always understand the dimensions a new program adds to our financial aid setup. We want to offer programs that respond to industry needs, but these shorter-term programs that start at different times in the semester don't fit our standard schedule or automated processes. For every unique program we run off schedule, we have to manually calculate payments and set up a new schedule in the system. Awarding for ATB students differs from that for non-ATB students. ATB requires setting up a new calendar and using the correct, manually calculated Pell formula.



How were your initial concerns addressed?

CD: Those concerns were addressed through early planning, cross-departmental collaboration, and TA provided by World Education that we received through participating in an ATB community of practice hosted by the California Community Colleges Chancellor's Office. We spent time clearly defining roles between financial aid, admissions and records, adult education, workforce, student services, and instruction. We relied heavily on the ATB community of practice, guidance from ED, training, and our Region IX Group. Starting deliberately, rather than rushing implementation, helped build confidence and buy-in across the institution.

DD: It came down to having the right conversations with adult education, the career pathway programs, and the registrar. We had to find the "best fit" for administering funds at scale. We set the guardrails: if the programs fit within our fall, spring, and summer standard terms, we have the flexibility to offer 8-week or 16-week classes. Once we had those guardrails in place, everyone had the same expectations and deadlines as the general population, which made it manageable for our office.

What was appealing to you about undertaking ATB?

CD: What appealed to us most was the student impact. ATB allows adults without a high school diploma or equivalent to access federal aid while pursuing education that leads to real workforce outcomes/gainful employment. It aligned closely with our mission as a community college—removing financial barriers, supporting workforce development, and serving nontraditional students who are often otherwise excluded from aid.

DD: The structure of the ECPP is a different way to help the community. Instead of just telling a student to “go get your GED®,” we are pairing that equivalency with a credential that leads to a self-sustaining career. It expedites the process. Before the recent changes, ATB was sometimes just a way to take random classes. Now, it’s used strategically as a catalyst to get people into the workforce.

What were the challenges to establishing and maintaining a process for administering federal student aid via ATB?

CD: The biggest challenge was process design. ATB does not fit neatly into traditional financial aid workflows. We had to determine how to identify potential ATB students early; verify ATB eligibility routes (e.g., approved career pathway enrollment); coordinate timing between enrollment, aid disbursement, and eligibility confirmation; and ensure accurate documentation and system coding (Management Information System). Another challenge was making sure all staff understood ATB, not just financial aid staff.

Sustainability is the main challenge. ATB requires continuous coordination, and staff changes can disrupt institutional knowledge. Regulatory updates also require us to revisit and refine processes. Volume is another factor—ATB cohorts can be small but labor-intensive, so maintaining consistency over time is critical.

DD: We need to ensure we’re communicating with the testing center about any updates to the testing requirements, so students are taking the right tests. On the maintenance side, people aren’t perfect. Our biggest challenge is when students withdraw after getting their GED® but before finishing their certificate. We then have to do a Return to Title IV (R2T4) and pull money back, even though they met half their goal.

How have you addressed those challenges and concerns?

CD: We addressed them by creating clear, documented workflows and reducing variability wherever possible. That included standardized intake steps and checklists; defined handoffs between departments; regular communication with adult education and workforce teams; and ongoing administrative and staff training at monthly meetings. We also included quality control checks to ensure ATB students are reviewed carefully before aid is awarded.



When the college enrolls an ATB student, what does the workflow look like from start to finish?

CD: From the financial aid perspective, the workflow generally looks like this: early identification by financial aid and adult education; confirmation that the student is enrolling in an approved ATB-eligible program; completion of the Free Application for Federal Student Aid (FAFSA®) and standard Title IV steps; verification of ATB eligibility pathway and documentation; financial aid review, awarding, and disbursement aligned with eligibility; orientation providing program requirements and resources available; and ongoing monitoring of enrollment and academic progress. Clear communication at each step is essential, especially so students understand what ATB means for them.

DD: Students come in through adult education orientations. Their advisor starts collecting the required documents and works with our analyst. They share a spreadsheet to ensure the student is admitted, has a FAFSA®, and has passed the three approved assessments. In our system, we use a “user-defined field”—basically a checkbox—that triggers automation and prevents them from being caught by packaging rules for funds they can’t receive, such as certain loans. We package them for Pell, and once they start classes, we disburse. If they get their GED®, we satisfy that field and they move into regular packaging rules.

What suggestions do you have for adult education and workforce administrators to help make the case for ATB to their financial aid office?

CD: Start by emphasizing shared goals—student access, completion, and workforce outcomes. Bring concrete information: program structure (workflows), student profiles (statistical data on age groups in your area without a high school diploma), and enrollment projections (everyone loves increased enrollment).

Involve financial aid early, respect compliance concerns, and be open to adjusting program design to meet Title IV requirements. ATB works best when it's a college-wide commitment, not a single-office initiative.

DD: Get financial aid and the registrar to the table early—don't bring them in at the last minute when the proposal is halfway done. If you give them the opportunity to dialogue from the start, they have ownership. Also, build your model around the school's "bread and butter" (clock-hour or credit-hour). Avoid changing established processes and try to make it work within your institution's existing structure. If the college is a standard credit-hour school, don't ask for a radical overhaul for 40 students when they are processing 20,000 through the standard setup. Title IV is a "team sport," and the workforce folks are the experts on labor market data; they just need to show the financial aid office how it fits the existing structure.

What support did you receive when adapting to the 2024 ATB regulations and ECPP requirements?

CD: We relied on the TA provided through the ATB community of practice, federal guidance, training, and Region IX group members. The most helpful support clarified ECPP requirements and documentation expectations. Having examples and opportunities to ask questions made adapting to the new regulations more manageable.

DD: The Dear Colleague letters and electronic announcements from ED were the most helpful for detailing the application requirements. We were submitting for our Prison Education Program at the same time, so I just delegated the document collection to the experts—the adult education and workforce team. I'm not the expert on labor market data—they are. I reviewed what they provided, submitted the E-App, and it went through without any questions.

What tips do you have for financial aid officers about managing the workflow for administering ATB?

CD: Treat ATB as an integrated part of your aid strategy, centralized and intentional, not extra or ad hoc. Document everything. Train more than one staff member in each department. Build relationships with instruction, adult education, and workforce. Expect ATB students to need more hands-on support.

DD: You need to understand the admission and onboarding process. Most issues are upfront; once the student is in class, it's straightforward. Also, make sure you list the specific tests you use on your E-App. We use the ACCUPLACER, and our Testing Center director is a contact on our E-App. You have to stay in sync with the Testing Center—if the test changes, you need to talk about it.

What do you wish you had known or understood about ATB from the start?

CD: I wish I had a better understanding of how much planning up front pays off later. ATB is absolutely achievable, but it requires clarity, patience, and collaboration. Once everyone understands the purpose and structure of ATB, implementation becomes much smoother.

DD: Have patience and grace—for yourself and your partners. You're going to make mistakes; we didn't even have our standard operating procedure finalized until 2024 despite starting years earlier. It takes time and work to build these relationships. If the teams start pointing fingers when a step is missed, you won't have the relationship needed to continue to "benefit" the students—no pun intended.

Appendix G. ATB State Team Self-Assessment

Introduction

This self-assessment was designed for state ATB teams participating in the Dual Enrollment for Adult Learners (DEAL) technical assistance (TA) activities.

Each section of the self-assessment outlines implementation practices that we derived from the findings of an unpublished landscape scan. The scan also identified common characteristics or metrics associated with states and institutions with a high level of ATB adoption. Ideally, state teams will develop a state-defined process that builds and leverages on the key attributes of (a) an intentional and sustained system, (b) a clear and collaborative partnership, and (c) a learner-centered approach.

The goal of the self-assessment is to identify strengths and gaps in existing state initiatives, systems, partnerships, and learner-centered approaches so ATB practices can be developed, improved, and incorporated into a robust state-defined process that meets federal requirements. The self-assessment's results are not meant to deter states from moving forward but to inspire ideas for action plans that will guide state teams in developing their state-defined processes and subsequent applications.

Instructions

This self-assessment should be completed with input from all members of the state ATB team. The self-assessment is divided into the following four sections:

- I. Intentional and Sustained Systems
- II. Clear and Collaborative Partnerships
- III. Learner-Centered Approach
- IV. Developing and Drafting the State-Defined Process

DEAL State Team Self-Assessment Worksheet

I. Intentional and Sustained Systems

Use this section to consider how current systems that support ATB can be strengthened, incorporated into your state-defined process application, and leveraged to promote and scale ATB at the institutional level.

Practices	Describe your current practices and next steps for developing and/or strengthening them. (Cells will expand to accommodate content.)
1. We have sufficient staffing and systems in place to address the additional administrative workload required to develop and administer a state-defined ATB process. This includes collecting data, monitoring compliance, calculating the success rate, and/or reporting responsibilities necessary for administering a state-defined process.	Current practices: Next steps:
2. We have identified ATB-aligned state-level priorities and statewide initiatives and program models to include in our state-defined process.	Current practices: Next steps:

Practices	Describe your current practices and next steps for developing and/or strengthening them. <i>(Cells will expand to accommodate content.)</i>
3. We have a system in place to review college-level data on ATB implementation to identify potential early adopter colleges to include in the state plan. (Consider both quantitative and qualitative data here.)	Current practices: Next steps:
4. We have a system in place to provide information, guidance, and support to colleges on how to prepare and submit an eligible career pathway program to ED for approval.	Current practices: Next steps:
5. We routinely share information about promising practices and innovations related to ATB implementation (e.g., Integrated Education and Training, competency-based diplomas, sources of funding) to support colleges in implementing ATB.	Current practices: Next steps:

Practices	Describe your current practices and next steps for developing and/or strengthening them. <i>(Cells will expand to accommodate content.)</i>
6. We sponsor informational and professional development convenings for college administrators and staff with responsibilities for implementing ATB (e.g., financial aid officers, advisors, adult dual enrollment professionals, career and technical education [CTE] administrators).	Current practices: Next steps:

II. Clear and Collaborative Partnerships

Use this section to identify current collaboration practices that can be strengthened, incorporated into your state-defined process application, and leveraged to promote and scale ATB at the institutional level.

Practices	Describe your current practices and next steps for developing and/or strengthening them. <i>(Cells will expand to accommodate content.)</i>
7. We have convened leaders and stakeholders who can contribute to the relevant components required in the state application for approval of the state process. These partners share a common vision, commitment, and goal for developing a state-defined ATB process to enable colleges to increase opportunities for adult learners.	Current practices: Next steps:

Practices	Describe your current practices and next steps for developing and/or strengthening them. <i>(Cells will expand to accommodate content.)</i>
8. We have drafted the roles and responsibilities of the multiple stakeholders who support ATB implementation and ATB student success at the state agency and local institutional levels.	Current practices: Next steps:
9. We routinely share information, guidance, and templates for colleges to develop agreements or memoranda of understanding and to document alignment, roles, and commitments across departments and offices internally and with adult education providers (who may be internal and/or external to the college).	Current practices: Next steps:

III. Learner-Centered Approach

Use this section to identify practices aligned with a learner-centered approach that can be strengthened, incorporated into your state-defined process application, and leveraged to promote and scale ATB at the institutional level.

Practices	Describe your current practices and next steps for developing and/or strengthening them. (Cells will expand to accommodate content.)
10. We have convened leaders and stakeholders who are motivated by a shared commitment to supporting the success of learners without a high school diploma or equivalency.	Current practices: Next steps:
11. We support and promote initiatives and program models that provide alternative pathways to earning a high school diploma or equivalency.	Current practices: Next steps:

Practices	Describe your current practices and next steps for developing and/or strengthening them. <i>(Cells will expand to accommodate content.)</i>
12. We support and promote initiatives and program models that provide alternative pathways to postsecondary credential attainment for learners without a high school equivalency.	Current practices: Next steps:
13. We support and promote multiple and alternative methods for assessing college readiness and course placement.	Current practices: Next steps:
14. We have a marketing strategy for raising public awareness of ATB that uses accessible language to engage potential ATB students.	Current practices: Next steps:

Practices	Describe your current practices and next steps for developing and/or strengthening them. (Cells will expand to accommodate content.)
15. We provide information, guidance, and templates to colleges to support their efforts to develop accessible marketing and recruitment strategies to reach potential ATB learners via admissions, adult education, and the broader community.	Current practices: Next steps:
16. We provide information and guidance to colleges to support their efforts to collect direct feedback from students about their ATB experience (e.g. via surveys, focus groups, and interviews).	Current practices: Next steps:

IV. Developing and Drafting the State-Defined Process

Use this section to note the status of your progress toward drafting the state-defined process and preparing to submit it for approval by ED.

Developing the State-Defined Process	Note the current status of your progress toward developing and drafting the state-defined process and identify next steps. <i>(Cells will expand to accommodate content.)</i>
17. We are aware of and developing all of the required components that must be included in a state application for a state-defined process, as outlined in DCL GEN-24-08 and 34 CFR §668.156 .	Current status: Next steps:
18. We have convened the relevant stakeholders and decision-makers necessary to draft the required components of the state process.	Current status: Next steps:
19. We are aware of the procedures in place for moving a state-defined process application through the appropriate level of state review and sign-off before submitting it to ED.	Current status: Next steps:

Developing the State-Defined Process	Note the current status of your progress toward developing and drafting the state-defined process and identify next steps. <i>(Cells will expand to accommodate content.)</i>
20. We have identified the appropriate team member(s) to lead the development and drafting of each required component of the state-defined process as outlined in DLC GEN-24-08 and 34 CFR § 668.156.	Current status: Next steps:
21. We have identified the team member(s) who will take the lead in compiling the drafted sections and finalizing the state-defined process application for final review by the team.	Current status: Next steps:
22. We have reviewed college-level data on ATB implementation to identify early adopter colleges to include in our application.	Current status: Next steps:

Developing the State-Defined Process	Note the current status of your progress toward developing and drafting the state-defined process and identify next steps. <i>(Cells will expand to accommodate content.)</i>
23. We have compiled data that establishes the need for expanding ATB usage in our state (e.g., labor market data, number of residents without a high school diploma, postsecondary attainment, rates of poverty).	Current status: Next steps:
24. Our state-defined process incorporates/leverages existing statewide initiatives and program models, such as Integrated Education and Training, Bridge to College, and career pathways and dual enrollment models designed for students without a high school diploma or equivalency.	Current status: Next steps:
25. We have drafted an overview of the requirements for participating institutions as described in 34 CFR § 668.156(a)(2)(i–v). The requirements for participating institutions illustrate how institutions will implement ATB with attention to the following: • intentional and sustained systems • clear and collaborative partnerships • learner-centered approaches	Current status: Next steps:

Developing the State-Defined Process	Note the current status of your progress toward developing and drafting the state-defined process and identify next steps. <i>(Cells will expand to accommodate content.)</i>
26. Our state-defined process includes examples of how the state does/will provide institutions with support, such as guidance, updates, and professional development, to implement ATB.	Current status: Next steps:
27. We have drafted the student eligibility requirements, which comply with student eligibility under 34 CFR § 668.156(a)(2)(iv). Our student eligibility requirements reflect elements of a learner-centered approach (e.g., through leveraging multiple methods of assessment, alternative pathways to college).	Current status: Next steps:

Appendix H. ATB State Process Action Plan Template

Instructions

State teams can use this action plan template to map their steps in preparing the state process application for submission.

- Ideally, teams will incorporate the ATB adopter practices identified in the State Team Self-Assessment tool to strengthen the state process: intentional and sustained systems, clear and collaborative partnerships, and learner-centered approaches.
- Interpret “certified statement establishing...” as “description of how you will implement” each of the required components.
- Note that unless a page limit is provided for a section, there is no limit.

Resources

- [DCL ID: GEN-24-08: Ability to Benefit State Process and Eligible Career Pathway Programs \(6/12/24\)](#)
- [Ability-to-Benefit Final Regulations \(10/31/23\)](#)
- [Approved State Process Applications as of July 2025](#) (Note that these applications predate the current regulations.)

34 CFR 668.156 Reference	State Process Section to Draft	Questions for the Team to Resolve	Lead Writer	Completion Target Date	Review & Approval
	Executive Summary/ Introduction				Reviewed by: Approved by:
	Overview of the process				Reviewed by: Approved by:
(a)(2)(i)	List of every postsecondary institution in the State that will participate in the State process. ¹				Reviewed by: Approved by:

¹ Including an institution doesn't obligate them to recruit ATB students, but if an institution isn't listed, it can't participate later.

34 CFR 668.156 Reference	State Process Section to Draft	Questions for the Team to Resolve	Lead Writer	Completion Target Date	Review & Approval
(a)(2)(ii)	Brief overview of the requirements of participating institutions. (2 pages max)				Reviewed by: Approved by:
(a)(2)(iv)	Brief overview of student ATB eligibility criteria and method for determining eligibility. (1 page max)				Reviewed by: Approved by:
(a)(2)(iii)	Certified statement ² establishing 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 . ³				Reviewed by: Approved by:

² States are not required to describe the process for ensuring that all ECPPs meet the documentation requirements, they just need to provide a simple statement certifying that all ECPPs meet the documentation requirements. Institutions should maintain internal documentation (under 668.157) about the ECPP in the event of an audit or compliance review.

³ Note that CFR § 668.156 was amended to remove the support services requirements from the State process, including orientation, assessment of a student's existing capabilities, tutoring, assistance in developing educational goals, counseling, and follow up by teachers and counselors, which duplicate the requirements in the definition of "eligible career pathway program."

34 CFR 668.156 Reference	State Process Section to Draft	Questions for the Team to Resolve	Lead Writer	Completion Target Date	Review & Approval
(a)(2)(v)	Certified statement establishing that not more than 33 percent of the participating institution's undergraduate regular students withdrew from the institution during the institution's latest completed award year. Include in the statement the raw numbers outlined in the calculation in 34 CFR 668.156(a)(2)(v) for each participating institution.				Reviewed by: Approved by:
(b)(2)	Certified statement establishing that the state 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.				Reviewed by: Approved by:
(c)(2) and (c)(3)	Certified statement establishing 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.				Reviewed by: Approved by:

34 CFR 668.156 Reference	State Process Section to Draft	Questions for the Team to Resolve	Lead Writer	Completion Target Date	Review & Approval
(c)(5) and (c)(6)	Certified statement establishing 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 under requirements (2) and (3) under "Requirements for ALL applications for approval."				Reviewed by: Approved by: