

# WYOMING COMMUNITY COLLEGE COMMISSION

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## Memorandum

**Date:** May 27, 2021

**From:** Dr. Ben Moritz – Deputy Director

**To:** Adult Education Local Directors, Student Services Council

**RE:** Adult Education Access to Eligible Career Pathways Programs

**Background:** Adult Education students receive substantial training and services to help them obtain high school equivalency certificates, prepare them to enter the workforce, and develop soft skills to ensure long-term employment, economic independence, and financial security. These services are provided free of charge through state, federal and local funding that supports Adult Education programs across the state.

Students wishing to pursue post-secondary studies, however, do not receive tuition assistance through Adult Education programs, and are frequently reliant upon need-based federal post-secondary funding such as Pell Grants. Pell Grants are not available to students without a high school diploma unless they can demonstrate an “Ability To Benefit” (ATB). In order to gain eligibility through ATB, a student must show their ability to benefit from postsecondary by fulfilling one of the following alternatives:

- 1) Passing one of the following tests:
  - a. Wonderlic Basic Skills Test, (English or Spanish version) Verbal Forms VS-1 & VS-2, Quantitative forms QS-1 & QS-2 (Passing Scores: Verbal=200; Quantitative=210 English version and 200 Spanish version)
  - b. Combined English Language Skills Assessment (CELSA) Forms 1 & 2 (Passing Scores: Reading=233, Writing=235, Arithmetic=230)
  - c. ACCUPLACER: Computer –adaptive tests and Companion ACCUPLACER Forms J & K: Reading, Writing & Arithmetic (Passing Scores: Reading=335, Writing=345, Mathematics=326)

- 2) Earning at least 6 credits of post-secondary credit, or
- 3) Through a State approved process that is approved by the U.S. Department of Education

When one of the alternatives is met, the student is eligible for all Title IV Federal Aid programs when enrolled in an ‘eligible career pathways program.’

Up to now, Wyoming has not formally identified Eligible Career Pathways Programs, which has created an obstacle to some Adult Education students’ ability to enroll in post-secondary programs. This memorandum establishes that the WCCC staff has reviewed the federal requirements for Eligible Career Pathways Programs, finds that WCCC policies meet or exceed these federal requirements, and provides guidance to the local Adult Education programs and Financial Aid Offices at the Colleges in Wyoming as to how to utilize the Ability to Benefit Clause.

### **Federal Requirements:**

As of May 9, 2016, the US Department of Education updated its definition of an Eligible Career Pathway Program through the Consolidated Appropriations Act of 2016. This updated definition is found in HEA 484(d)(2) and aligns with WIOA (29 U.S.C.3102(7)).

“An eligible career pathway program means a program that combines rigorous and high-quality education, training, and other services that:

1. Aligns with the skill needs of industries in the economy of the State or regional economy involved;
2. Prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeships registered under the Act of August 16, 1937 (commonly known as the ‘National Apprenticeship Act’; 50 Stat. 664, chapter 663; 29 U.S.C. 50 et seq.);
3. Includes counseling to support an individual in achieving the individual’s education and career goals;
4. 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;
5. Organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;
6. Enables an individual to attain a high school diploma or its recognized equivalent, and at least one recognized postsecondary credential; and
7. Helps an individual enter or advance within a specific occupation or occupational cluster.

Additionally, the eligible career pathway program must include a Title IV eligible postsecondary program component and a component that enables an individual to attain a high school diploma or its recognized equivalent.

**Alignment with WCCC Policies:** The WCCC staff have reviewed the Adult Education State Policies that govern the use, reporting, and expenditure of state and federal funds by the local Adult Education programs. We have found those policies meet or exceed the federal requirements 2-7 listed above. Requirement #1 is met by the community colleges through the WCCC's academic program approval process, wherein all new academic programs must demonstrate an alignment with local and/or state economic and industry needs. Therefore, Adult Education students in Wyoming who earn eligibility through ATB and enroll in any course or program of study previously approved by the Wyoming Community College Commission can be declared as eligible to receive federal financial aid through the Ability To Benefit Clause.