



**February 24, 2022**

**Strategic Partnerships/Workforce Development**

---

## **Ability to Benefit State-Defined Process Plan**

MINNESOTA STATE

# INTRODUCTION

Minnesota State Colleges and Universities (Minnesota State) is pleased to submit the following Ability to Benefit (AtB) State-Defined Process (State Process) for consideration by the U.S. Department of Education. We believe that this process will prove to be an invaluable tool in creating greater access to higher education for adult learners who find themselves without a high school diploma or equivalent. The State Process complements and supports the Minnesota State system's ongoing Equity 2030 and Guided Learning Pathways work, and the State of Minnesota's legislative goal to improve educational attainment across demographic groups by 2025.

Minnesota State is the third largest system of state colleges and universities in the United States and the largest in the state with 30 colleges, 7 universities, and 54 campuses, which serve 340,000 students each year. Minnesota State has more Black and Indigenous students, as well as students of color, attending our colleges and universities than all other higher education providers in Minnesota combined. Approximately 63 percent of our college students and 70 percent of our university students receive financial aid.

Minnesota State offers 3,885 academic programs, including 802 fully online programs and we award more than 37,000+ degrees, certificates, and diplomas annually. Sixty-four percent of Minnesota resident students who are pursuing an undergraduate credential are doing so at a Minnesota State college or university. In terms of outcomes, 87 percent of Minnesota State students place in jobs in a related field of study. As a whole, our system has 5,000+ employer partnerships. Our three strategic priorities are to: 1) Ensure access to an extraordinary education for all Minnesotans, 2) Be the partner of choice to meet Minnesota's workforce and community needs, and 3) Deliver to students, employers, communities and taxpayers the highest value/most affordable option.

Two overarching goals of the Minnesota State system are the [Equity 2030](#) initiative and the Guided Learning Pathways (GLP) framework to increase completion at all of Minnesota States' 30 colleges and 7 universities. The goal of Equity 2030, developed through a system-wide collaborative, year-long process, is to close the educational equity gaps across race and ethnicity, socioeconomic status, and geographic location by the end of the decade at every Minnesota State college and university. The vision for Equity 2030 is to improve operational structures, policies, procedures, and organizational cultures in ways that will increase the rate of credential completion for first-generation students, low-income students, Alaskan Native, Asian, Black, Hispanic, Indigenous, Native Hawaiian, Pacific Islander, and mixed race students at every Minnesota State college and university. The Minnesota State Guided Learning Pathways Framework (GLP Framework ) was approved by the Minnesota State Board of Trustees in November 2020 after a three-year collaborative development process. Building on evidence from across the nation, the GLP Framework outlines characteristics of effective practices in supporting students throughout their educational journey with academic and career planning support and advising. The GLP Framework will be implemented over the next two years. Equity 2030 and the GLP Framework serve as a structure within which the AtB state-defined process finds alignment and support.

Data on educational attainment in Minnesota make it clear that an AtB State Process would benefit Minnesotans. While Minnesota ranks 2nd (50 percent) nationally in the percentage of its population (aged 25 to 64) with an associate degree or higher and while fully 97 percent of White Minnesotans have

at least a high school diploma or equivalent, Minnesota also evidences wide educational attainment gaps across race/ethnicity. According to 2019 Census data, of the 4,336,963 individuals in Minnesota that make up the total adult population aged 18+, 304,899 individuals in that population have no high school diploma (7 percent of the adult population) and more of this population is Black, Indigenous and People of Color. For example, 39 percent of Mexican Minnesotans, 36 percent of Somali Minnesotans and 27 percent of Hmong Minnesotans 25 and over do not have a high school diploma or equivalent. And the relationship between education and income is critical. As Will Durden and Terese Craig (Nov. 17, 2020) noted in their presentation *Ability to Benefit: Developing and Aligning State and Federal Student Aid Policy*, “[n]early 30 percent of adults nationwide with household incomes at or below the poverty line lack a high school credential.” The Minnesota Office of Higher Education concluded in their 2015 report that “[g]reater educational attainment correlates with increased earnings, lower unemployment, better health, and other social and economic benefits” and that “ensuring the path to family-sustaining wages for our communities of color and indigenous communities represents a moral imperative for the state.” Because the Minnesota Legislature enacted a state postsecondary educational attainment goal that 70 percent of Minnesota adults (age 25 to 44) will have attained a postsecondary certificate or degree by 2025 (Minn. Laws 2015 Chapter 69 Article 3 Sec. 6),<sup>1</sup> it is clear there is a need for aligned pathways into college and living wage jobs for those Minnesotans who lack a secondary credential.

One step that adult learners can take to access post-secondary education is achieving a high school diploma or equivalent. Adult Basic Education (ABE), administered by the Minnesota State Department of Education and operating throughout the State of Minnesota, serves adults who are working towards a high school credential, learning English, improving basic skills such as literacy and math, and/or preparing students for post-secondary education or employment. Two goals of Minnesota ABE are to help students achieve a high school equivalency (GED or Diploma) and gain or improve skills necessary to enter post-secondary education and training. Annually, Minnesota Adult Education (ABE) serves more than 30,000 adults who are working towards a high school credential, learning English, improving basic skills such as literacy and math, and/or preparing for post-secondary education or employment. More than 80% of Minnesota Adult Education students are Black, Indigenous, and/or People of Color. Services are delivered through a network of 39 consortia comprising all Minnesota school districts as well as other partners including the correctional system and community-based organizations. The diploma/equivalency programs available through ABE are Credit Completion, Standard Adult Diploma and GED and will soon include the [Hi-SET](#), a high school equivalency examination and alternative to the GED that will soon be available to Minnesotans through the Minnesota Department of Education.

Dual enrollment in *both* an HSD/E and post-secondary career pathway program represents a critical, efficient pathway that thousands of Minnesotans could take advantage of, gaining needed academic skills, a high school credential, and working toward workforce preparation leading to a living wage job. Data from the Office of Higher Education (OHE) shows that between the 2009-10 and 2016-17 academic years, of the 3,046 ABE students who enrolled in postsecondary institutions in Minnesota, approximately 12% completed a CTE credential. We think a State Process would allow for better success rates for former ABE students seeking living wage jobs because of the intentionality of the State Process we have designed, grounded in a partnership between Minnesota State Colleges and Universities and Adult Basic Education. The State AtB Process has the support of the Minnesota Department of Education, the

---

<sup>1</sup> The law also sets 30 percent and 50 percent educational attainment benchmarks for all races and ethnicities. Educational attainment refers to the highest level of education an individual completes. The U.S. Census measures educational attainment of a population as a percentage or count of the population that holds a postsecondary credential (certificate, associate degree, diploma, bachelor’s degree, master’s degree, graduate certificate, and doctoral or professional degree).

Minnesota Office of Higher Education (OHE), and the Department of Employment and Economic Development (DEED), and aligns with and supports the Legislature’s educational attainment goals. In fact, Minnesota’s recent work with the National Governors Association led them to conclude that the Ability to Benefit pathway into college is a key way to address education affordability barriers for Minnesotans.

An AtB State Process would also support WIOA, Perkins and AEFLA activities in the State. In Workforce Investment and Opportunity Act (WIOA) legislation (Subtitle A – System Alignment, Chapter 1 – State Provisions – Sec. 101 State Workforce Development Boards), there are requirements to make development of career pathways strategies a required function of the state and local workforce boards and make career pathways a permissible activity under all parts of the Act. In addition, local and regional state plans need to provide relevant education and training to ensure that individuals, including youth and individuals with barriers to employment, have the skills to compete in the job market and that employers have a ready supply of skilled workers. The Minnesota State system office monitors and reports on federal requirements related to college and university operations and administers funding received under the federal Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (PL 115-224, enacted July 31, 2018), the goal of which is to support the academic and career and technical skills of secondary education students and postsecondary education students in career and technical education programs. The Minnesota Department of Education (MDE) administers funding received from the Workforce Innovation and Opportunity Act (WIOA) Title II Adult Education and Family Literacy Act (AEFLA), one of the purposes of which is to assist adults in attaining a secondary school diploma or its recognized equivalent and support the transition to postsecondary education and training through career pathways. Finally, the Governor's Workforce Development Board should make use of career pathways for the purpose of providing individuals, including low-skilled adults, youth, and individuals with barriers to employment (including individuals with disabilities), with workforce investment activities, education, and supportive services to enter or retain employment. We see this plan as supporting alignment of critical State workforce activities.

How do we know students admitted as AtB students will be successful? Starting in 2007, Minnesota FastTRAC (Training, Resources, and Credentials) was a program model administered in Minnesota that connected low-skill, low-wage adults to adult basic education, career and technical postsecondary credentials, and living wage jobs between 2009 and 2015<sup>2</sup>. It was modeled on the I-BEST program in Washington state. According to data collected by Minnesota State Colleges and Universities on the Minnesota FastTRAC program between 2010 and 2012, students’ college credit completion rate was 88 percent. This is an identical rate to the credit completion rate of Washington’s State’s I- BEST program according to [Jon Kerr](#), former director of Basic Education for Adults for the State of Washington. FastTRAC funding was later rolled into a larger grant program called Pathways to Prosperity (P2P) administered by the Minnesota Department of Employment and Economic Development.

Data are accumulating on the successes of Pathways to Prosperity; [qualitative information](#) suggests that P2P is building on the success of FastTRAC. FastTRAC data, like data from I-BEST and success stories from P2P, make it clear that low-skill, low-wage workers with no HSD/E can be successful in college and that collaboration between Minnesota State, Minnesota Department of Education and DEED works well to produce successful student outcomes.-Further, we believe that the AtB State Process will produce even more successful outcomes than FastTRAC because there are three additional requirements under the

---

<sup>2</sup> In 2013 the following state appropriation was made out of the Workforce Development Fund; (f) \$1,500,000 each year is from the workforce development fund for a grant to FastTRAC - Minnesota Adult Careers Pathways Program. Up to ten percent of this appropriation may be used to provide leadership, oversight, and technical assistance services for low-skilled, low-income adults.

State Process that weren't in place for FastTRAC: 1) coordination of referrals between ABE professionals and designated campus staff; 2) a student readiness self-assessment to be discussed between the ABE professional and the designated campus staff person; and 3) professional development for all staff involved in the AtB State Process.

In summary, Minnesota State and our partner agencies (MDE/ABE, OHE and DEED) see the AtB State Process as a critical avenue for adults without a high school diploma or equivalent (HSD/E) to access higher education, complete a credential and earn family-sustaining wages, leading to more individual, family and community prosperity. To provide even greater flexibility to prospective learners, Minnesota State will promote the use of all three AtB options (approved test, six-credit completion and State Process options) on our campuses. These three options, including the State Process defined in this document, supports Minnesota State's Equity 2030 and Guided Learning Pathway initiatives, aligns with the State's various workforce activities, and provides maximum flexibility to the State's adult learners as they work toward credential completion.

## PLAN HIGHLIGHTS

The Minnesota State Ability to Benefit Process provides the following:

- a list of potential participating Minnesota State institutions that will have the opportunity to take part in the Ability to Benefit State-Defined Process
- a description of how Minnesota State campuses will implement the services that must be provided to AtB students, including but not limited to: (a) student orientation, (b) tutoring/academic support, (c) comprehensive academic assessments to determine each student's existing readiness for college enrollment, (d) assistance with a plan to achieve educational milestones and goals, (e) individualized academic counseling that incorporates an understanding of each student's appropriate class level enrollment or career pathway entry points, and (f) faculty/counselor follow-up regarding each student's classroom performance and their progress towards academic goals and/or program completion
- a description of candidate eligibility requirements, overall AtB program design and process design including stakeholder roles and responsibilities, training and collateral materials that Minnesota State will provide
- monitoring, compliance and termination processes

## POTENTIAL PARTICIPATING INSTITUTIONS

The following 30 Minnesota State community and technical colleges will have the opportunity to participate in the Ability to Benefit State-Defined Process, pending campus leadership agreement to the compliance requirements outlined in the Intra-agency Agreement found in Appendix A.

1. Alexandria Technical & Community College
2. Anoka Technical College
3. Anoka-Ramsey Community College
4. Central Lakes College
5. Century College
6. Dakota County Technical College
7. Fond du Lac Tribal and Community College
8. Hennepin Technical College
9. Hibbing Community College
10. Inver Hills Community College
11. Itasca Community College
12. Lake Superior College
13. Mesabi Range College
14. Minneapolis College
15. Minnesota State College Southeast
16. Minnesota State Community and Technical College
17. Minnesota West Community & Technical College
18. Normandale Community College
19. North Hennepin Community College

20. Northland Community & Technical College
21. Northwest Technical College
22. Pine Technical & Community College
23. Rainy River Community College
24. Ridgewater College
25. Riverland Community College
26. Rochester Community and Technical College
27. St. Cloud Technical and Community College
28. Saint Paul College
29. South Central College
30. Vermilion Community College

## REQUIRED SERVICES

Under the Minnesota State AtB State Process, participating colleges in collaboration with Adult Basic Education providers are required to provide each participating AtB student with comprehensive supports and services. Evidence of support and student engagement are essential to the student's success. These services include:

### Student Orientation

The orientation should familiarize students with the college's policies, campus resources, student rights, and the institution's academic standards and requirements. Orientation should also include: information regarding the use of common administrative forms; the use of online learning management systems (including online courses); how to interpret educational terminology/jargon (i.e., FAFSA, GPA, etc.); how to complete online registration processes: how to access web-based student accounts/email/grades; how to access student financial information and billing statements; and the key components of student financial aid options and requirements (34 CFR 688.156 (c)(1)). Students should understand and agree to the AtB process requirements and expectations, as outlined in the Student FAQ document provided to all AtB students. Students should understand the correlation between meeting these requirements and maintaining student financial aid eligibility. Students should also understand the expectation that students will be co-enrolled in ABE as they seek to finish their GED or adult diploma. Orientation may be provided by an individual advisor/counselor/navigator or through an established orientation delivered virtually, in-person or in a hybrid environment.

### Assessment

Minnesota State has already developed guidance for institutions on helping students self-assess their readiness for college using Guided Self-Placement (GSP) and a majority of campuses already actively use GSP for adult learners. Minnesota State also supports the best practice of using multiple measures as described in System Procedure 3.3.1, Part 4, Subpart F. Campuses will use local and system campus placement policies, which may include Accuplacer and/or guided self-placement and/or multiple measures, for AtB students. Institutions within our System are also encouraged to consider students' career interests with the aim of developing comprehensive student assessment profiles (34 CFR 688.156 (c)(2)).

Students will be assessed according to Minnesota State and local policies and will be placed appropriately. Examples of types of assessments that may be used include:

- MCA/SAT/ACT, or other standardized test scores (ACCUPLACER)
- high school GPA even if they didn't graduate, if available
- planned enrollment or enrollment and success in Adult basic Education coursework, a Credit Completion program, a high school equivalency program (e.g., GED), or the Standard Adult Diploma program
- interview which includes review of academic history, e.g., HS GPA even if they didn't graduate; work history; and career interests (e.g., completion of a career interest assessment like the free online assessment available from Minnesota State (<https://www.minnstate.edu/careerexploration/planningtools/interest-assessment/index.html>) and/or other career tools found on the Minnesota State career planning pages (<https://www.minnstate.edu/careerexploration/>)
- completion of a college readiness self-assessment



The CASAS /TABE, used in ABE assessment, may be used as part of Guided Self-Placement (GSP).

## Tutoring/Academic Support

Tutoring/academic support must be available and tailored to each student's needs. Services must be free for students and provided by trained tutors including peer tutors and/or instructors and provided via online/virtual services if available. The college must monitor all AtB students' participation in tutoring/academic support activities. Students will be required to participate in tutoring/academic support services the first semester at a minimum as well as when the student is not making satisfactory academic progress. In these cases, simply making a referral for tutoring/academic support would be an insufficient level of student intervention and would not be compliant with the Minnesota AtB State Process requirements (34 CFR 688.156 (c)(3)).

## Connecting Academic Goals to Career Pathways

Students must be provided professional assistance in developing and mapping out their educational and career goals, for example using tools located on [Minnesota State's Career Planning webpages](#). Students should also be taught how to access their educational information for the purpose of monitoring their own progress towards these goals. Students should be made aware of the clear connections between their academic and career goals, and they should also be provided with educational resources like the [Minnesota State Career Planning workbook](#) and training opportunities that are directly applicable to their desired career or industry. Students will also be instructed in the process of making changes or modifications to their academic plan and how these modifications may affect their career goals (34 CFR 688.156 (c)(4)). Another support advisors/navigators may want to use includes a [Cost of Living Calculator](#) provided by the Department of Employment and Economic Development (DEED) so students may connect academic programs, career pathway program projected outcomes and cost of living in specific counties in Minnesota.

## Counseling and Advising

The terms *counseling* and *advising* might also be referred to as *case management* using a holistic student support model (see also *Connecting Academic Goals to Career Pathways*). Other important provisions of this service will be assisting students in creating personal education plans that map their academic goals to career goals (e.g., <https://drive.google.com/file/d/1WDymFlnljpXXGzjtaH017BSU5kGv7Wsk/view>), identifying academic and non-academic supports, and addressing the function(s) of financial aid or other financial resources that will help the student reach their goals. The Minnesota State Process will require a multi-faceted approach to counseling/advising services, which includes providing career, academic, and financial information as needed (34 CFR 688.156 (c)(5)).

- o Participants must enroll in a Title IV eligible program with a goal of completing the program. The college should not enroll a student in an educational program that is not consistent with the student's career and educational goals.

## Measuring Progress & Student Follow-up

Students shall be provided with follow-up evaluation of their classroom performance and progress made towards their educational and career goals through academic advising, student support services, and/or processes such as the Early Alert process, which exists on every campus. These follow-up services shall be provided by faculty, counselors, advisors, academic support staff and/or others who have appropriate skills and experience to provide those services effectively ((34 CFR 688.156 (c)(6)).

# ELIGIBILITY, PROGRAM DESIGN AND PROCESS DESIGN

## Candidate Eligibility

Minnesota State's Process for Ability to Benefit defines eligibility as any adult student (beyond the age of Minnesota compulsory education) who *does not* meet other AtB eligibility criteria (i.e., successfully completing a standardized assessment/exam or successfully completing 6 college-level credits), and who:

- is eligible for Adult Basic Education (ABE)
- successfully completes a combination of assessment approaches as designated in the State Process
- is recommended by a trained campus contact to participate in Ability to Benefit
- has selected an approved career pathway program ([20 U.S.C. § 1091\(d\)\(2\)](#))
- meets any other program academic requirements (such as math and/or writing) or other prerequisites in order to maximize student success and positive outcomes and which may be determined by a faculty member in the selected career pathway program

Candidate eligibility will be closely monitored. A trained campus team will determine and monitor progress of students deemed eligible for AtB enrollment, with support from one or more system office staff.

## Program Design

The Minnesota State AtB State Process is designed to assist students and prospective students that have not earned a high school diploma or equivalent and who do not meet other alternative AtB eligibility criteria (i.e., successfully completing a standardized assessment/exam or successfully completing 6 college-level credits) to enroll in and be successful in a career pathway program, in partnership with MDE/ABE. Participating AtB students will be strongly encouraged and guided by their trained advisor, counselor, navigator or faculty member to complete a high school credential or GED wherein the student is making satisfactory progress toward both a high school credential or its equivalent and an approved post-secondary career pathway program for which the student is receiving Title IV funding.

## Process Design

To implement the AtB State Process successfully, clear stakeholder roles, training, collateral materials and monitoring procedures are needed as well as a transparent process that campuses and ABE partners can follow.

## Stakeholder Roles and Responsibilities

Multiple stakeholders will support AtB candidates and ensure they can be successful in college. The roles and responsibilities of each stakeholder are listed below:

- **System office** – the system office will designate a system office staff person to coordinate the AtB State Process; this role will coordinate training, oversight and technical assistance, with other system office staff as needed, to all campuses in the plan
- **Adult Basic Education (ABE)** – ABE providers and Minnesota Department of Education will be the primary providers for students earning their secondary credential during the AtB process while the students pursue an approved career pathway program and will also recommend candidates to campuses for participation in the State Process, and use tools described in the Assessment section of this plan and other tools to prepare students for college and career transitions. ABE may involve CBOs and literacy and workforce education partnerships as needed based on the context within which ABE providers are working.
- **Department of Employment and Economic Development (DEED)** - client-serving staff can recommend candidates for participation in the State Process
- **Campus advisors, counselors, navigators and/or faculty** – Campus advisors, counselors, navigators and/or faculty will ensure students receive the necessary supports outlined in this plan both at student entry into the college and to completion; they will monitor process compliance related to support services required as part of this plan
- **Faculty and campus leadership** – faculty and campus leadership will identify eligible career pathway programs on their campus that are best aligned with the State Process, i.e., criteria for selection of AtB career education will be:
  - high student completion rates, leading to jobs with high rates of employment and family-sustaining wages
  - meet other needs for existing career pathway programs as determined by faculty and leadership
  - need/desire more enrollment and/or more diverse student enrollment in their programs
  - meet the WIOA definition of an eligible career pathway program
- **Financial aid directors** – financial aid directors will ensure, in partnership with advisors, counselors, navigators and/or faculty that students identified as eligible for AtB will have met the requirements outlined in this plan and are eligible to receive Title IV funding; they will also ensure that codes used to identify AtB students are coded correctly in Minnesota State’s “Integrated Student Record System” (ISRS).
- **Registrars** – campus registrars will ensure, with financial aid directors, that students participating in the AtB State Process option will be enrolled as an AtB student using a cohort code that identifies the student correctly in ISRS
- **Governor’s Workforce Development Board (GWDB)** – GWDB ad hoc committee members will function in an advisory capacity to provide feedback to campuses on their

eligible career pathway programs

All of the stakeholders listed above will be trained on the AtB State Process requirements as outlined in this document and given all technical information required to ensure compliance with federal regulations.

## Training

Virtual trainings in the form of interactive webinars will be offered to all campus staff and ABE, DEED and CBO staff responsible for interacting with, overseeing or referring students to participate in the state process. Trainings will be hosted by system office staff in collaboration with ABE statewide administrators; campus technical experts such as Financial Aid directors, registrars; and others. Trainings will review:

- information on the federal AtB provision
- the three AtB pathways
- case studies of successful AtB use on campuses
- requirements of this plan (e.g., assessment)
- processes for referring students (for CBOs and ABE)
- using/referring students to accepted career pathway programs unique to each campus
- the roles and responsibilities of all stakeholders in the process
- processes for preparing students to transition to campuses and
- Q & A session

For campus and ABE staff, trainings will also include, at a minimum, overview of collateral materials (described next), selecting eligible career pathway programs for participation in this program, maintaining appropriate documentation, and an overview of the monitoring and compliance plan.

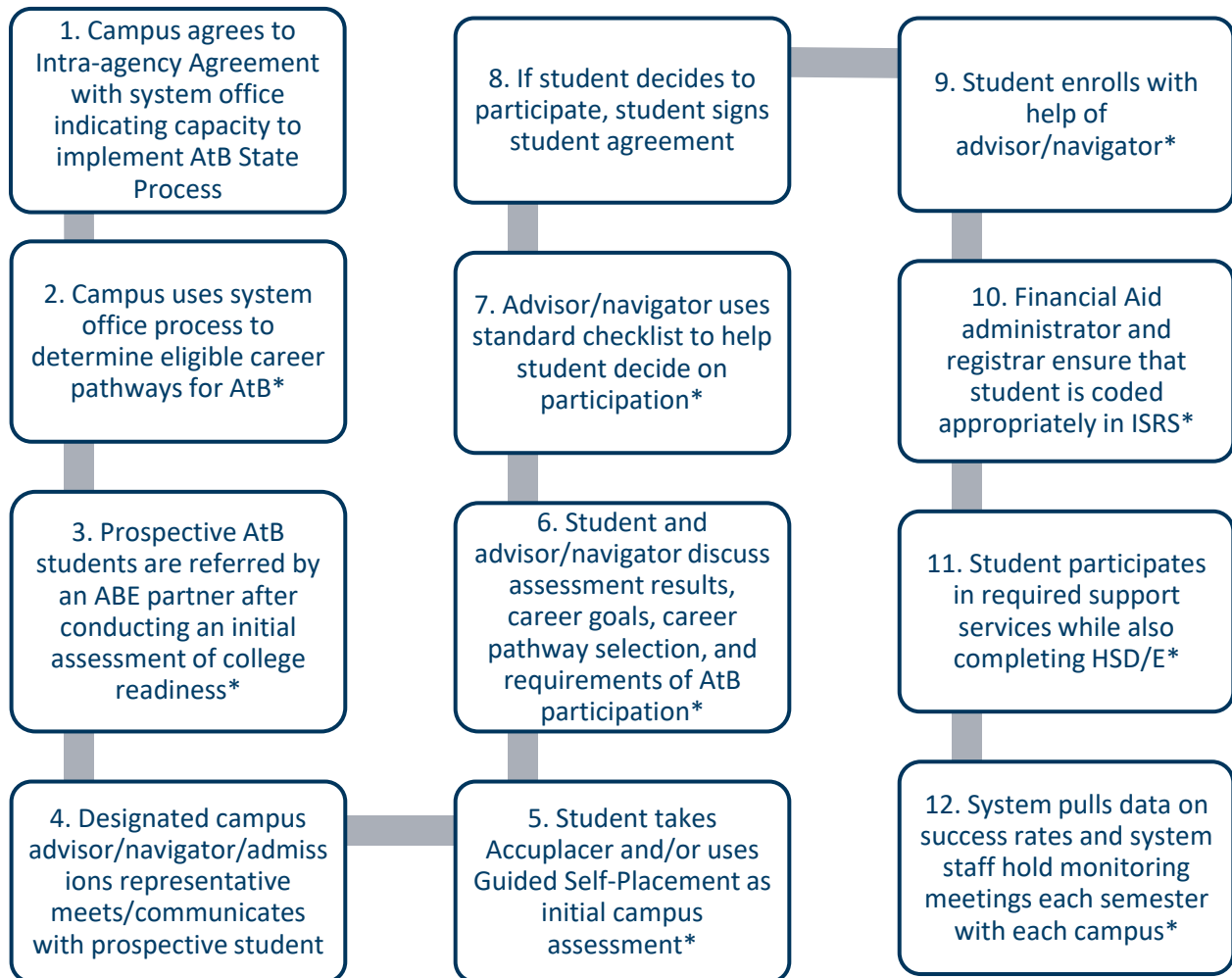
## Collateral materials

Collateral materials that will support stakeholders in implementing the process will, at a minimum, include the following: an Intra-agency Agreement between campuses and the system office (see Appendix A), a Campus User Guide and FAQ including information on coding for the AtB state process in the Minnesota State ISRS student information system and ABE Student Information Database, and a Student Eligibility Checklist. For students, collateral will include, at a minimum, a Student FAQ and Student Agreement form that describes student responsibilities (e.g., eligible pathways, accessing six services, coursework completion and success requirements).

## Process map

This process map below shows campuses and ABE the steps to follow to ensure compliance with this plan.

## Chart 1. Minnesota State Ability to Benefit State-Defined Process Map



System office provides technical assistance and oversight for all steps in the process

\*System office and/or ABE provide professional development for campus and ABE staff for this step

## MONITORING, CORRECTIVE ACTION AND TERMINATION

Minnesota State will annually monitor each of the participating institutions for compliance within the Minnesota State Process for Ability to Benefit requirements and standards of service. Minnesota State will identify corrective action(s) if an institution is found to be non-compliant with the Minnesota State Process for Ability to Benefit requirements. Minnesota State will

terminate an institution's participation in the State Process if the institution does not meet the goals established by the corrective action(s) as per 34 CFR 668.156 (d).

## Monitoring

Minnesota State has developed an Intra-agency Agreement (IA) to guide the colleges that will participate in the State Process. By agreeing to the IA, participating institutions confirm their commitment to implementing this process. This agreement includes a requirement to participate in each semester compliance meeting, where designated campus staff and system office staff review MOU requirements.

## Documentation

Campus staff will be required to provide the following documentation in the first semester of implementation:

- A list of the career pathway(s) AtB eligible students will be able to participate in
- Pathways will be approved using a standard checklist like [this one](#); will be introduced to prospective students by campus ABE partners who are familiar with the approved pathways; and will be overseen on a semi-annual basis by the Governor's Workforce Development Board, who will provide feedback on the pathways based on local workforce needs and using knowledge of related Statewide employment and education initiatives
- A list of campus staff involved in the AtB State process plan implementation;
- A description of how the institution will ensure and monitor all students participating in ATB receive each of the six services required in the provision (typically documented by an academic advisor in wrap-around student support services, e.g., TRIO or other comprehensive student support program)

## Meetings

Each semester, campus staff will meet individually with system office staff to review campus compliance, update any documentation as needed, identify additional career pathway programs in which AtB eligible students can enroll, how they will resolve any data collection issues, etc.

## Trainings

In addition to individual meetings, compliance will be enhanced as campus staff participate in the following:

- annual half-day professional development training hosted by Minnesota State and Adult Basic Education to review and improve implementation of the Minnesota State AtB process and compliance requirements; ABE can provide professional development on Career Program Pathways to ensure compliance with the WIOA Career Program Pathways definition

- semester calls and/or webinars hosted by Minnesota State and Adult Basic Education to discuss process requirements and strategies in scaling AtB for eligible students;
- additional training offered by Minnesota State regarding monitoring and compliance with reporting AtB participants through ISRS and to review AtB success rates for participants

Student participation in each of the six required AtB student services will be documented through another process by campus designated staff and will include one of multiple methods, including written advisor/counselor/navigator reports on each student, reports from student services software systems like EAB or Starfish, or another method.

Monitoring AtB student activity in these areas will provide Minnesota State with the information needed to ensure AtB students are meeting the State Process requirements.

**A note about calculating student success rates:** Compliance is enhanced through a robust, enterprise-wide data reporting system, the Integrated Student record System (ISRS). ISRS is a longitudinal reporting system that collects hundreds of data elements including student demographics, student level of education, course enrollments, course grades, program enrollments, and program completions. Minnesota State annually provides data to campus presidents and the chancellor on student success rates like the rates that must be calculated to comply with the State process plan. System office IT or Institutional Research (IR) staff, who collaboratively provide student success reporting to the system, will create the required student success rate reports each year per requirements (b) and (h).

Data elements that will be included in these reports are:

- Total number of AtB students in the system, by AtB pathway status (ACCUPLACER cut score method, six credit method, State process method) and by institution;
- AtB students' level of high school education;
- AtB student first-generation, race/ethnicity and/or Pell eligible status
- AtB student enrollment in a career pathway program;
- AtB success rates as defined by the US Department of Education;

ISRS already includes codes that flag AtB students as participating in the six-credit option or Accuplacer score AtB options. The federal code that identifies students as enrolling under the State Process will be added to ISRS and campus registrars and financial aid staff will be trained on how to locate and use the code.

Minnesota State campuses and system office have a successful history calculating and submitting required student success rates for federal entities, for example for IPEDS reporting and Perkins reporting. Minnesota State, both campuses and system office, have the capacity to produce the success rates required, as defined by the US Department of Education.

## Corrective action

Minnesota State will ensure corrective action if an institution is found to be in noncompliance with the State Process requirements, as determined through monitoring activities described above. If requirements of the State Process are not being met, identified institutions will be placed on a corrective action plan. Institutions placed on a corrective action plan must demonstrate that the campus and all students in the State Process have met the requirements of the process and will be required to demonstrate compliance by the second semester following the noncompliance finding.

## Termination

Minnesota State will end an institution's participation in the State Process if the institution has not complied with the State process requirements by the second semester after the noncompliance finding. We will do this by reviewing the corrective action plan with an institution and providing assistance needed to bring the campus back into compliance. If an institution is not able to demonstrate that they have met the requirements of the corrective action plan by the second semester, they will cease to be approved to use the State Process for a period of one academic year, starting from the time at which the institution has been deemed out of compliance. The institution will not be included in the system office-maintained list of eligible institutions offering the State Process and will be added back to the list after one year if they can show how they will ensure compliance for each non-compliance issue. The system office will work with students at institutions that are no longer eligible to participate so students may still have a pathway to complete, for example, by helping students enroll at a campus that is eligible for participation.



## APPENDIX A: Ability to Benefit State Process: Memo to Campuses



MINNESOTA STATE

**DATE:**

**TO:**

**FROM:**

**SUBJECT: AtB State Process Intra-agency Memo**

### Purpose

The purpose of this memo is to outline system and campus responsibilities for allowing students to enroll at a Minnesota State college campus under the federal provision that allows for an Ability to Benefit State-Defined Process (“State Process”).

### AtB and the State-Defined Process

Ability to Benefit (AtB) is a provision of the federal Higher Education Act. It allows postsecondary students who lack a high school diploma or its equivalent (HSD/E) to receive federal financial aid like Pell grants. Financial aid opens college and career opportunities to these students, who typically have less developed skills, low incomes and are disproportionately people of color. The State-Defined Process allows students without a HSD/E to enroll in an institution based on meeting the requirements of the State Process.

There are three ways students may participate in AtB:

1. Pass the ATB acceptable academic assessment (Accuplacer) or other entrance exam (currently available to students)
2. Successfully complete six college credits (currently available to students)
3. Be enrolled via the State Process (see attachment)

This memo concerns student and campus participation in the State Process.

Participation in the State Process is optional. Campuses may elect to participate if campus leaders, staff and faculty implementing the process determine that the campus has the capacity to implement the State Process in compliance with all requirements as outlined in the State Process attachment.

## System Responsibilities

Staff in the system office agree to do the following:

1. Provide documents for successfully implementing AtB on a campus, including but not limited to:
  - a. A campus user guide including frequently asked questions (FAQ)
  - b. A student guide including frequently asked questions (FAQ)
  - c. A student agreement form
2. Provide professional development to all campus staff and ABE providers involved in the AtB process each semester or annually
3. Host regular virtual meetings with individual campuses to address questions/concerns
4. Provide ongoing technical assistance to campuses on an as-needed basis

## Campus Responsibilities

Participating institutions agree to do the following:

1. Identify Career Pathway Programs at your institution that meet the WIOA Career Pathway definition as described in section 484(d)(2) of the Higher Education Act for AtB student enrollment:
  - 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, 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.);
  - 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;
  - e. 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;
  - f. Enables an individual to attain a high 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.

2. Work effectively with ABE and other partners to identify potential students eligible to be enrolled under the AtB provision
3. Ensure students enrolled under the AtB provision receive the six essential services outlined in the State-Defined Process and that participation in these services is documented for reporting purposes
4. Identify a key contact (advisor, navigator, counselor or faculty member, depending on the participating Career Pathway Programs available to students) who is responsible for AtB student success
5. Identify a key contact who is responsible for campus oversight related to this agreement
6. Ensure any staff involved in the AtB process participate in required professional development
7. Identify AtB students in the Integrated Student Records System (ISRS) appropriately, using coding provided by the system office, for federal, state and/or system office tracking and reporting purposes
8. Ensure key contacts participate in semesterly meetings with system office staff to review compliance requirements as outlined in this memo
9. Provide any required data to the system office ISRS
10. Agree to the Monitoring, Corrective Action and Termination requirements of the State Process

## Corrective Action and Termination

Participating institutions are required to meet the responsibilities above. If any of these are not met as determined at semesterly meetings between the designated campus staff representative and the system office staff coordinating AtB compliance, the institution will be placed on a corrective action plan.

If after two semesters the issues deemed out of compliance are not resolved as outlined in the corrective action plan, the institution will not be allowed to participate in the State Process for a period of one year, starting from the time at which the institution is deemed out of compliance. System office staff will work with students at institutions that are no longer eligible to participate so students may still have a pathway to complete, for example, by helping students enroll at a campus that is eligible for participation.

## Designated Campus Staff

Campus leadership will identify key campus contacts (see Campus Responsibilities #4 and #5, above), which will be documented by system office staff coordinating AtB compliance. Key campus contacts are required to attend trainings and meetings to effectively comply with the State Process.

## Documenting Participation Interest

If the campus has the capacity to successfully assume the responsibilities outlined above for State Process participation, the campus President or appropriate member of the senior leadership team may reply to \_\_\_\_\_ to have that interest documented. Follow-up steps will be provided by system staff.

Minnesota State is an affirmative action, equal opportunity employer and educator.

**REMOVE BEFORE PRINTING:**

*This page should always be an even page to ensure that it is the back cover of the report.*

**For questions, contact Jess Niebuhr, Senior System Director for Strategic Partnerships - [jess.niebuhr@minnstate.edu](mailto:jess.niebuhr@minnstate.edu)**



**MINNESOTA STATE**

**30 East 7th Street, Suite 350 | St. Paul, MN 55101-7804  
651-201-1800 | 888-667-2848**

[www.MinnState.edu](http://www.MinnState.edu)

---

This document is available in alternative formats to individuals with disabilities. To request an alternate format, contact Human Resources at 651-201-1664. Individuals with hearing or speech disabilities may contact us via their preferred Telecommunications Relay Service.

Minnesota State is an affirmative action, equal opportunity employer and educator.