

Item #11.3  
September 17, 2021

Illinois Community College Board

### **ABILITY TO BENEFIT ALTERNATIVE STATE PLAN**

The ICCB is seeking approval from the U.S. Department of Education for Illinois to have an Alternative State Defined Process for Ability to Benefit use. The purpose of Illinois' Ability to Benefit State-Defined Process is to increase access to federal financial aid for eligible adults without a high school diploma, who with proper support can be as successful as their peers in postsecondary credential and degree completion.

Ability to Benefit (ATB), a provision of section 484(d) of the Higher Education Act (HEA), aids in equity of access to Federal Financial Aid for adult learners lacking a high school diploma. The ATB provision allows eligible adult learners who are participating in a career pathway program as amended in Public Law 114-113 under section 484(d)(2) of the HEA at a Title IV eligible institution to have access to financial aid. However, the two currently approved methods of ATB are underutilized due to the challenges they place on students. Thus, an alternative plan is being sought by Illinois as allowed by the U.S. Department of Education to overcome barriers to postsecondary attainment and scale ATB use.

In the spring of 2021, ICCB Workforce Education staff convened a focus group of key stakeholders from adult education programs, community college leadership, financial aid, and other relevant partners to develop an Illinois Ability to Benefit Alternative State Plan. The State Plan encompasses required expectations for participation, expected student services, outcome measures, and required data and accountability processes to support the educational acceleration of adults without a high school diploma. ICCB staff shared an informational webinar with the field in April and will hold information sessions on September 27 and October 1, 2021 for community colleges in order to finalize institutions who will opt to participate in the alternative plan.

Included in this item is the Ability to Benefit Alternative State Plan that the ICCB will submit to the U.S. Department of Education this fall for approval for use in SFY2023-202



# **Illinois Ability to Benefit Alternative State Plan**

For Submission to the U.S. Department of Education, 2021



## Table of Contents

<b>Executive Summary</b> .....	<b>2</b>
<b>Section I: Background</b> .....	<b>4</b>
<b>Section II: Participating Institutions</b> .....	<b>5</b>
<b>Section III: Program Design</b> .....	<b>5</b>
<b>Section IV: Student Eligibility Criteria</b> .....	<b>6</b>
<b>Section V: Required Student Services</b> .....	<b>7</b>
<b>Section VI: Success Rate</b> .....	<b>8</b>
<b>Section VII: Data Collection and Reporting</b> .....	<b>10</b>
<b>Section VIII: Monitoring</b> .....	<b>10</b>
<b>Section IX: Corrective Action</b> .....	<b>11</b>
<b>Section X: Termination Clause</b> .....	<b>11</b>
<b>Appendix A: Institutional Notice of Interest Form</b> .....	<b>12</b>
<b>Appendix B: Allowable Career Clusters</b> .....	<b>13</b>

## Executive Summary

The purpose of Illinois' Ability to Benefit Alternative State Plan is to outline a state-defined process to increase access to federal financial aid for eligible adults without a high school diploma, who with proper support can be as successful as their peers in postsecondary credential and degree completion. Ability to Benefit (ATB), a provision of section 484(d) of the Higher Education Act (HEA), aids in equity of access to Federal Financial Aid for adult learners lacking a high school diploma. The ATB provision allows eligible adult learners who are participating in a career pathway program, as amended in Public Law 114-113 under section 484(d)(2) of the HEA to align with the definition of Section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102(7)), at a Title IV eligible institution to have access to financial aid.

The Illinois Community College Board (ICCB) convened a focus group of key stakeholders from adult education programs, community college leadership, financial aid, and other relevant partners to develop an Illinois Ability to Benefit Alternative State Plan which outlines an alternative method for ATB use beyond the two currently approved methods<sup>1</sup>. The State Plan encompasses required expectations for participation, expected student services, outcome measures, and required data and accountability processes to support the educational acceleration of adults without a high school diploma, a population that is traditionally underserved and faces inequitable access to opportunities for postsecondary credential and degree attainment leading to economic self-sufficiency.

The ICCB conducted a survey in 2019 to understand ATB implementation in the community college system. The survey found that 19 institutions were implementing ATB in limited circumstances. The survey also shed some light on the challenges and reticence for ATB implementation. The two most cited reasons for not utilizing ATB were lack of knowledge of who qualified and that the current provisions were too limiting. From this, it was determined that an Alternative State-Defined Process could enhance ATB implementation for eligible students in Illinois.

The Illinois State-Defined Process for Ability to Benefit provides the following:

1. Participating institutions of higher education
2. Program design
3. Student eligibility
4. Required services that will be provided to ATB students by the participating institutions, including, but not limited to:
  - A) Orientation;
  - B) Assessment;
  - C) Tutoring;
  - D) Career Goal Development;
  - E) Counseling; and,

---

<sup>1</sup> <https://studentaid.gov/understand-aid/eligibility/requirements>

F) Follow Up.

5. Calculation and reporting requirements of the rate of success, as defined by the U.S. Department of Education
6. Data Collection and Reporting
7. Provisions for monitoring participating institutions
8. Corrective Action
9. Termination Clause

## Section I: Background

### *Illinois Community College Board*

The Illinois Community College Board (ICCB) is governed by a twelve-member, governor-appointed board responsible for administering the Illinois Public Community College Act (P.A. 78-669) and providing leadership and coordination for Illinois' system of 39 public community college districts. The ICCB administers the Public Community College Act in a manner that maximizes the ability of the community colleges to provide high-quality educational programs and services that are affordable, accessible, and meet the needs of a diverse student population. The ICCB has statutory responsibility for the statewide planning and coordination of the community college system. It administers state and federal grants to the community college districts and adult education providers and manages high school equivalency testing for Illinois. As the administrator of WIOA Title II, Adult Education and Literacy, the ICCB has outlined goals in *Expanding Career Pathway Opportunities in Adult Education: Strategic Directions for Illinois*<sup>2</sup> which addresses the following key priorities of Adult Education and Literacy and aligns with the mission and goals of the ICCB:

- Scaling effective strategies and models across the system,
- Providing opportunities for postsecondary transitions and credential attainment,
- Preparing learners for college and career readiness, and
- Establishing lifelong career pathways systems and integrating enabling technologies.

Illinois is poised to scale ATB use for eligible students. This plan's program design is built on the foundations of longstanding work in Illinois regarding career pathways, equity, and integrated education and training program development.

### *Illinois' Postsecondary Attainment Goal*

Expanding access and use of ATB will further contribute to Illinois' Postsecondary Attainment Goal adopted by the P-20 Council established under 105 ILCS 5/22-45 which "strives to increase the proportion of adults in Illinois with high-quality postsecondary degrees and credentials to 60% by the year 2025"<sup>3</sup>. To aid Illinois in achieving this goal, the ICCB Adult Education and Literacy funded programs provided 50,725 adult learners with career services instruction in Fiscal Year 2020. Of these learners, 63% identified as female and 76% identified as students of color (NRS Table 1: FY2020)<sup>4</sup>. Yet, the need to increase the number of adults who obtain a postsecondary credential must improve. According to the U.S. Census Bureau, nearly 1.4 million of Illinois' residents age 18 and over are in need of a high school credential, equivalent to 10.8% of the State's

---

<sup>2</sup> [https://www.iccb.org/iccb/wp-content/pdfs/adulted/publications\\_reports/ICCB\\_AE\\_Strategic\\_Plan\\_Draft\\_1-4-18.pdf](https://www.iccb.org/iccb/wp-content/pdfs/adulted/publications_reports/ICCB_AE_Strategic_Plan_Draft_1-4-18.pdf)

<sup>3</sup> <https://www2.illinois.gov/sites/P20/Pages/default.aspx>

<sup>4</sup> <https://nrs.ed.gov/rt/il/2019>

population. For Illinois to achieve its postsecondary attainment goal, the State must continue to provide viable pathways to these adults.

Part of demonstrating the effectiveness of an ATB-eligibility process requires considering the cultural diversity, economic circumstances, and educational preparation of the populations served. In Illinois, many residents in need of a high school and postsecondary credential struggle to pay for the first six college credits or have been out of school for many years and have difficulty passing a standardized test, the two currently approved methods for ATB use. These realities place the potential of ATB out of reach for many students who would benefit from and succeed with federal student aid. While many institutions have attempted to address the affordability issue by utilizing WIOA Title I dollars, college foundation scholarships, and community resources, an Alternative ATB plan provides a route to a more sustainable and scalable option.

## **Section II: Participating Institutions**

***Requirement: Not every eligible institution of higher education in the state needs to participate in the Alternative State-Defined Process. However, every institution that plans to utilize and implement the state-defined ATB process must be listed within the plan.***

*Institutions must opt in for inclusion in Illinois' ATB State-Defined Process prior to submission to the U.S. Department of Education for approval. Institutions cannot be added annually. If your institution would like to utilize the state-defined process, during the period of the plan (July 1, 2022-June 30, 2026), please submit a notification of interest form for the institution utilizing the template in Appendix A.*

## **Section III: Program Design**

This plan is designed to support ATB implementation within a career pathway system. In 2017, the ICCB in partnership with other education and workforce agencies and partners created a working group that developed the Career Pathway Dictionary<sup>5</sup>. The dictionary outlines a definition of a career pathway program (aligned with WIOA), identifying quality elements, while defining other key education and workforce activities. This set the groundwork for interagency collaboration, common messaging, and local development and implementation of career pathways in Illinois. In order to utilize ATB, institutions must identify the career pathway program that the eligible student will be pursuing. Eligible career pathway programs must fall within one of Illinois 17 Career Clusters as identified in the Illinois State Perkins V Plan<sup>6</sup>. Institutions should prioritize

---

<sup>5</sup> [https://icsps.illinoisstate.edu/images/pdfs/CTE/Perkins\\_V/6Perkins\\_V\\_Resource\\_IL-Career-Pathways-Dictionary.pdf](https://icsps.illinoisstate.edu/images/pdfs/CTE/Perkins_V/6Perkins_V_Resource_IL-Career-Pathways-Dictionary.pdf)

<sup>6</sup> <https://www.iccb.org/cte/perkins-v-state-plan/#:~:text=What%20is%20the%20Illinois%20Perkins,%2D%20June%2030%2C%202024>

programs of study that lead to occupations that are high-skill, in-demand, and high-wage. The allowable career clusters in Illinois can be found in Appendix B.

To satisfy U.S. Department of Education guidance, institutions must be able to document (1) how the career pathway meets the definition as set forth by section 484(d)(2) of the Higher Education Act, which aligns with the Career Pathway Dictionary; and (2) how the career pathway program includes workforce preparation activities and training for a specific occupation or occupational cluster and is aligned with local needs.

One specific strategy within a career pathway is integrated education and training (IET)<sup>7</sup>. Illinois uses its Integrated Career and Academic Preparation System (ICAPS) for the development, implementation, and evaluation of integrated education and training programming. ICAPS fosters a partnership between Adult Education and Career and Technical Education by integrating both credit technical training and basic skills education into the educational experience, delivering education in a team-taught environment, and culminating in educational functioning level gains and industry recognized credentials. Illinois envisions integrated education and training programs as the main vein for ATB implementation. The coordination of integrated education and training programs between adult education instruction and college credit programs, in combination with the fiscal support of ATB, accelerates learners' education and credential attainment.

A key component to this program design is case management and comprehensive wraparound student support services. This is evident in the required student services along with the student eligibility requirements. Students are recommended to work towards their High School Equivalency (HSE) attainment while also working towards a postsecondary certificate or degree. The combination of these achievements will assist students in improving their skills and employment options.

Extensive professional development will be provided by the ICCB and its partners prior to and during the first year of implementation (expected to be SFY2023) to help promote programmatic success. Ongoing professional development, technical assistance, and monitoring will be offered throughout the period of the plan.

#### **Section IV: Student Eligibility Criteria**

Illinois' Process for Ability to Benefit defines eligibility as any adult student (beyond the age of Illinois Compulsory Education) who *does not* meet other ATB eligibility criteria. Students who may make ideal candidates include those who:

---

<sup>7</sup> IET is adult education and literacy, workforce preparation, and workforce training "each of sufficient intensity and quality, and based on the most rigorous research available, especially with respect to improving reading, writing, mathematics, and English proficiency of eligible individuals" that "occur simultaneously," "use occupationally relevant instructional materials," and are "organized to function cooperatively" with "a single set of learning outcomes" (34 CFR §463.37).



- are enrolled in an Early School Leaver Transition<sup>8</sup> or an ICCB approved Alternative Methods of Credentialing for High School Equivalency<sup>9</sup> programming **OR**
- have successfully completed a Bridge Program within Adult Education.

## **Section V: Required Student Services**

***Requirement: Each participating institution will provide students with each of the following six student service components.***

Under this plan, participating institutions of higher education will provide each eligible ATB student with comprehensive support services. Evidence of student support and engagement are essential to each student's success. These services must include:

**1. Assessment of each student's existing capabilities through means other than a single standardized test.**

To be eligible for the alternative process, an assessment must be conducted utilizing multiple measures of assessment. Institutions need to utilize two or more assessment methods as provided below. Evidence must be documented in the student ATB file. This information may be requested as part of the monitoring conducted by the ICCB. Potential assessment methods include:

- GED Ready practice tests
- Instructor or employer referrals
- High school transcript review
- HSE and ESL assessments
- Writing samples
- Student interviews

**2. Orientation regarding the institution's academic standards and requirements and student rights.**

All ATB students must attend orientation to become familiar with college and academic policies, processes, and terminology. Participants must have access to student resources that include information on technology (computer labs, email, learning management systems, online classes, wi-fi and laptops), advising and counseling, financial aid requirements and literacy, and tutoring. ATB students may attend orientation offered to all other students.

**3. Assistance with goal setting and career pathway planning.**

Colleges will provide goal setting assistance from advisors. Goal setting involves both education and employment short and long-term planning. Those advisors may be from the

---

<sup>8</sup> <https://www.esltpillinois.com/>

<sup>9</sup> [https://www.iccb.org/adult\\_ed/illinois-high-school-equivalency/students-test-takers/transcript-based-alternative-methods-of-credentialing/](https://www.iccb.org/adult_ed/illinois-high-school-equivalency/students-test-takers/transcript-based-alternative-methods-of-credentialing/)

career services or advising functions of the college, adult education program (transition coordinators, navigators, etc.), or specific academic programming.

#### **4. Counseling and Academic Advising**

The terms counseling and advising can also be categorized as case management. Students will receive assistance in creating an academic program plan that is aligned to their career goals; students will also identify academic and non-academic supports, as well as financial resources, that will help them reach their goals. This service will be customized to each student, and it will include components of a holistic student support model. Other important provisions of this service will be assisting students in 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 Illinois process will require a multi-faceted approach to counseling/advising services, this includes providing career, academic, and financial information as needed (34 CFR 688.156 (c)(5)).

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.

#### **5. Tutoring in basic verbal and quantitative skills if appropriate.**

All ATB students will have access to tutoring services in order to support academic instruction. If the student is part of an ICAPS program, that tutoring could occur in their support course. Tutoring could also be provided by Learning/Tutoring Centers on campus or specific tutoring offered by instructors or other staff connected to a course. Tutoring is only required when the student demonstrates need.

#### **6. Follow-up regarding progress.**

Students must be provided with follow-up regarding their classroom performance and any progress made towards their educational and career goals. These follow-up services must be provided by instructors, counselors, case managers, advisors, and/or others who are appropriately trained in retention and case management strategies. Throughout the student's journey, this support could lead to tutoring or advising recommendations. After a student completes their goals, this support could involve notifying institutional partners of HSE attainment or earned college credit.

### **Section VI: Success Rate**

***Requirements: ATB enrolled students must have a success rate that is within 95 percent of the success rate of students with high school diplomas (non-ATB students).***

The ICCB has the capacity to collect and produce the required state success rate data as defined by the U.S. Department of Education (see below). With the approval of the ICCB state-defined ATB process, students participating in ATB and those not participating in ATB will be identified and reported by approved institutions through the annual student data submission process. Student success rates will be calculated by the ICCB at the end of each academic year for Illinois as an aggregate and for each Illinois ATB institution. Institutions with less than a 95% success rate will follow corrective action planning as identified in Section IX. Results will help to inform compliance with the state defined process and to identify technical assistance needs.

The Success Rate Formula is prescribed by the U.S. Department of Education and is as follows:

### **STUDENTS WITH HIGH SCHOOL DIPLOMAS OR EQUIVALENT**

The number of students during the applicable award year enrolled who-

- (i) Successfully completed education or training programs;
- (ii) Remained enrolled in education or training programs at the end of that award year; or
- (iii) Successfully transferred to and remained enrolled in another institution at the end of that award year.

DIVIDED BY

The number of students who enrolled in education or training programs in participating institutions during that award year who remained enrolled (minus the number of students who subsequently withdrew or were expelled from participating institutions and received a 100 percent refund of their tuition under the institutions' refund policies.)

EQUALS

Success Rate for Students with High School Diplomas or Equivalent

### **STUDENTS WITHOUT HIGH SCHOOL DIPLOMAS OR EQUIVALENT**

The number of students without high school diplomas (or equivalent) who, during the applicable award year enrolled in participating institutions and –

- (i) Successfully completed education or training programs;
- (ii) Remained enrolled in education or training programs at the end of that award year; or
- (iii) Successfully transferred to and remained enrolled in another institution at the end of that award year;

DIVIDED BY

the number of students with high school diplomas who enrolled in education or training programs in participating institutions during that award year who remained enrolled after subtracting the number of students who subsequently withdrew or were expelled from participating institutions and received a 100 percent refund of their tuition under the institutions' refund policies.

EQUALS

Success Rate Among Those Without a High School Diploma

The success rate for students without a high school diploma or equivalent must be at least 95% of the success rate for the peer group (students with a high school diploma or equivalent).

## **Section VII: Data Collection and Reporting**

The ICCB uses several data reporting methods and resources to accurately monitor and analyze student data. The primary data repository source used by ICCB from the colleges is through the collection of student-level data submissions. The data reside in the ICCB Centralized Data System which is a secure, centralized interface through which data is stored and retrieved. Only authorized ICCB staff are allowed access to the data and consult with other agency staff to generate tables and reports to monitor performance. The Illinois Ability to Benefit State-Defined Process will ensure that the all required data can be accessed for the purpose of calculating the rate of success for students within participating institutions.

Colleges will submit annual implementation reports following each academic year, due August 30. These reports will include aggregate student information (no PII)- career clusters and program of study ATB students are participating in, types of industry credentials earned, college credentials earned, dates of ATB orientation offered, how many of each assessment option was utilized, tutoring and other academic and career planning services offered, etc. Additionally, space will be provided on the annual report for story-telling data of student success.

## **Section VIII: Monitoring**

***Requirement: States must monitor each institution annually for compliance with standards and requirements within the state-defined process.***

Monitoring will occur annually. A review of reports will be completed by ICCB ATB staff and contact with institutions will be made when data and reporting illustrate potential issues. If needed, an on-sight or virtual visit may occur to help remedy any issues.

In addition to data collection and reporting to determine compliance with success rate requirements and ATB processes, institutions must be able to document (1) how the career pathway(s) utilized meet the definition as set forth by WIOA, which aligns with the Career Pathway Dictionary; (2) how the career pathway program(s) include workforce preparation activities and training for a specific occupation or occupational cluster and is aligned with local needs, and (3) that the institution has a process for tracking and confirming that ATB students a) have utilized one of the three methods for ATB utilization as approved by the U.S. Department of Education (e.g. successfully completed an approved exam, attained 6 credit hours, participating as a part of the approved state process) to make them eligible for federal financial aid; AND b) are enrolled in adult education and postsecondary education. Concurrent enrollment is not required.

## **Section IX: Corrective Action**

***Requirements: A corrective action is required for any institutions found to be out of compliance.***

Institutions that report not performing any of the required components will be placed on a Watch List with a Corrective Action Plan for how they intend to meet that requirement.

Institutions with a 91-94% Success Rate will be put on a Watch List for one year with no Corrective Action Plan required. In Year 2, if the success rate increases to at least 95%, the institution is removed from the Watch List and placed in good standing. If the institution continues to have less than the required 95% success rate, they will need to submit a Corrective Action Plan. If an institution has a Success Rate of 90% or lower, the program will complete a Corrective Action Plan. If an institution reports a success rate of less than 95% for three consecutive years, the institution will be terminated from participating under this State-Defined Plan.

## **Section X: Termination of Alternative Ability-to-Benefit State Plan or Institutional Participation**

***Requirement: Termination of an institution is mandated if they refuse or fail to comply with policies.***

If the ICCB decides to terminate this plan or not renew this plan at any given time, institutions will be notified within 90 days of its termination. At that time, institutions will need to determine which of their students are mid-program utilizing the state-defined process. Institutions will not be allowed to enroll new students upon notification. However, institutions will be required to continue the support of existing ATB students until they have obtained at least 6 credit hours and therefore eligible for ATB through that policy option.

If an institution is terminated due to non-compliance, the institution is required to continue the support of existing ATB students until they have obtained at least 6 credit hours and therefore eligible for ATB through that policy option.

## Appendix A – Institutional Notification of Interest Form

Ability to Benefit (ATB), a provision of section 484(d) of the Higher Education Act (HEA), aids in equity of access to Federal Financial Aid for adult learners lacking a high school diploma. The ATB provision allows eligible adult learners who are participating in a career pathway program as amended in Public Law 114-113 under section 484(d)(2) of the HEA to align with the definition of Section 3 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102(7)) at a Title IV eligible institution to have access to financial aid.

The purpose of Illinois' Ability to Benefit State-Defined Process is to increase access to federal financial aid for eligible adults without a high school diploma, who with proper support can be as successful as their peers in postsecondary credential and degree completion.

### Institutional Obligations:

- a. Request to be part of the State-Defined Process via this form
- b. Collaborate internally to enroll, support, and track eligible students per the requirements of Illinois' Ability to Benefit State-Defined Process
- c. Submit Program Implementation Reports on an annual basis (August 30)
- d. Maintain a success rate of 95% as defined in Section VI or be in compliance with Section IX.

Institutions are not obligated to:

- e. Enroll a minimum number of students in ATB via this State-Defined Process, even if they have opted into the plan.

Institutional participation under this plan is set for SFY2023-2027 (July 1, 2022- June 30, 2026).

---

Community College:

District #:

College Designee for Agreement:

Phone #:

Email:

President:

Date:

*Please complete, sign, and return the following document to Angela Gerberding, Associate Director for Integrated Career Programs at [angela.gerberding@illinois.gov](mailto:angela.gerberding@illinois.gov).*

## **Appendix B - Allowable Career Clusters in Illinois**

1. Agriculture, Food, and Natural Resources
2. Arts (Performing and Visual), Audio/Video Technology and Communications
3. Business Management and Administration
4. Finance
5. Marketing
6. Hospitality and Tourism
7. Transportation, Distribution, and Logistics
8. Education and Training
9. Government and Public Administration
10. Law, Public Safety, Corrections, and Security
11. Human Services
12. Health Sciences
13. Information Technology
14. Architecture and Construction
15. Manufacturing
16. STEM
17. Energy