



**UNITED STATES DEPARTMENT OF EDUCATION**  
**OFFICE OF POSTSECONDARY EDUCATION**

May 16, 2022

Ms. Jennifer K. Foster  
Deputy Executive Director  
State Illinois High School Equivalency Administrator  
Illinois Community College Board  
401 E. Capitol Avenue  
Springfield, IL 62701  
jennifer.foster@illinois.gov

Dear Ms. Foster,

This letter responds to your application to the U.S. Department of Education (Department) regarding the Illinois Community College Board's (ICCB) request for approval of an ability-to-benefit (ATB) State process to allow students without high school diplomas to receive Federal student financial aid under the programs authorized by Title IV of the Higher Education Act, as amended, while enrolled in an eligible career pathway program.

Under 34 CFR 668.156(e), if the Secretary does not disapprove a State's ATB process within six months after the date of submission of the process to the Secretary, the State process is deemed to be approved. The Department received Illinois's request for approval of its State process on November 15, 2022. As the period for the Department's response has expired, Illinois's ATB process is approved, and you may begin implementing it. Illinois's State process is approved for the three-year period ending May 15, 2025.

Currently the Department's Common Origination and Disbursement (COD) System does not have a Student Eligibility Code (SEC) for a student who does not have a high school diploma (or its recognized equivalent) but who meets the ATB requirements through participation in an approved State process. Therefore, until such time as COD System changes are made, institutions in Illinois participating in the State process should use the SEC value "07" – GED or State Auth. HS Equivalent Certificate – for any student who receives Title IV aid on the basis of Illinois's approved State process.

Please retain a copy of this letter to serve as Federal Student Aid's authorization for the 40 institutions listed on your application to use this alternative SEC in the event that your submission of "07" is ever questioned by auditors.

400 Maryland Avenue, S.W., Washington, DC 20202  
[www.ed.gov](http://www.ed.gov)

*The Department of Education's mission is to promote student achievement and preparation for global Competitiveness by fostering educational excellence and ensuring equal access.*

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The Illinois plan is the fifth State process to go into effect. We are excited about the opportunity to learn from you and are available to provide technical assistance to you. If you have questions regarding COD System processing of ATB students, please contact Marie Fitzpatrick at [marie.fitzpatrick@ed.gov](mailto:marie.fitzpatrick@ed.gov) or (312) 730-1549. For all other questions, please contact Aaron Washington at [aaron.washington@ed.gov](mailto:aaron.washington@ed.gov) or (202) 453-7241.

Sincerely,

Annmarie Weisman  
Deputy Assistant Secretary  
for Policy, Planning, and Innovation

cc: Marie Fitzpatrick  
Aaron Washington