

ABILITY TO BENEFIT (ATB) STATE DEFINED ALTERNATE PLAN

GUIDEBOOK 2026



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What is Ability to Benefit?

Ability to Benefit (ATB) is a provision in the Higher Education Act (HEA) that allows a student who has not received a high school diploma or its recognized equivalent to be eligible for Title IV Federal student aid. This includes eligibility for Federal Pell Grants, need-based aid that helps low-income students cover the cost of tuition and living expenses. In order to receive financial aid through ATB, the student must also be enrolled in a career pathway program which meets the federal definition.

In order to gain eligibility for Federal student aid through ATB, a student who has no high school diploma must complete one of 3 ATB options for eligibility:

1. The student receives a passing score on one of the Department of Education approved ATB tests. In Illinois, the **Wonderlic Basic Skills Test (WBST)** and **ACCUPLACER** are commonly used for determining ATB eligibility. Tests must be administered according to ATB Test Policy.
2. The student completes at least six credit hours or 225 clock hours that are applicable toward a Title IV-eligible degree offered by the postsecondary institution.
3. The college must be a participant in the State's process approved by the Secretary of Education ("State-defined process"). Illinois's State-Defined Process was first approved in May 2022 and renewed in May 2026 to expire on May 15, 2031.

Ability to Benefit options 1 and 2 are not new, but they tend to be underutilized. Developing an alternative state defined process aims 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.

FREQUENTLY ASKED QUESTION ABOUT BASIC SKILLS

FAQ: If a student holds a high school diploma but has been assessed as basic skills deficient, are they ATB eligible?

A: No. If a student already holds a high school diploma, or its equivalency, they are eligible for federal financial aid, but the institution through its admission and assessment processes may encourage or require students to participate in adult basic education or development education programming prior to enrolling in credit programming.

Why Should We Expand the Use of ATB?

While the traditional path to Federal Financial Aid for students with high school diplomas is the most commonly used avenue to financial resources such as PELL grants, Ability to Benefit options allow students without high school equivalency to access these resources while pursuing eligible career pathway certificates and degrees.

ATB is an opportunity to make college accessible and affordable for those without a high school credential and promotes economic mobility. Individuals without a high school diploma are a largely untapped labor source and their needs align with the education and training that our colleges provide. ATB also may create additional enrollment opportunities for students interested in approved career pathways. ATB makes college affordable for individuals without a high school diploma, allowing them to gain educational experience and ultimately find meaningful employment.

The Illinois State-Defined ATB Process

Institutions must have opted into the Alternative Process with email notification to the ICCB by October 10, 2025, in order to have been listed in the Plan when it was submitted for approval to the Department of Education in November 2025 in order to utilize the Alternative Process for ATB during the plan period of May 15, 2026- May 15, 2031. Institutions cannot opt in at a later date.

Please note that an institution may have opted in to participate but never enroll a student through Ability to Benefit. Opting into the Plan means that the institution has the opportunity to utilize the Alternative Process. It does not require that the institution utilize the Alternative Process. Only Illinois community colleges were allowed to opt into the Plan.

Colleges eligible to participate in the Plan:

- Black Hawk College
- Carl Sandburg College
- City Colleges of Chicago
 - Harold Washington
 - Harry S. Truman
 - Kennedy-King
 - Malcolm X
 - Olive-Harvey
 - Richard J. Daley
 - Wilbur Wright
- College of Lake County
- Elgin Community College
- Heartland Community College
- Highland Community College
- Illinois Central College
- Illinois Eastern Community Colleges
- John A. Logan College
- John Wood Community College
- Joliet Junior College
- Kaskaskia College
- Kishwaukee College
- Lewis & Clark Community College
- Lincoln Land Community College

- Moraine Valley Community College
- Morton College
- Parkland College
- Prairie State College
- Rend Lake College
- Rock Valley College
- Sauk Valley Community College
- Shawnee Community College
- South Suburban College
- Southeastern Illinois College
- Southwestern Illinois College
- Triton College
- Waubonsee Community College
- William Rainey Harper College

The state-defined process has three primary benefits:

1. Streamlines the processes and procedures—by bringing the eligibility determination to the staff level at the college
2. Eligibility criteria is more flexible for adult students—and now looks to multiple assessment methods instead of a singular point in time standardized score
3. Creates additional awareness, support, and accountability for ATB implementation—by leveraging institutional creativity and knowledge through collaboration in the design and implementation

The Illinois model is built on the foundation of longstanding work in Illinois regarding career pathways, equity, and integrated education and training program development. 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 standard methods for demonstrating Ability to Benefit.

These realities place the potential for Ability to Benefit out of reach for many students who would benefit from career education.

Many ICCB institutions have attempted to address the affordability and access issue by utilizing WIOA Title I dollars, college foundation scholarships, and other community resources. This Alternative Ability to Benefit Plan provides a more sustainable and scalable option.

To implement the Alternative Plan, program design is key and includes requirements and recommendations. Strong wraparound student services are essential to this plan.

Required elements are:

- ATB is administered in alignment with an Eligible Career Pathway Program;
- High School Equivalency coursework must be available but is not required for students to invoke the state plan on ATB.

- The program includes only eligible students—this means that students who qualify for traditional Ability to Benefit or meet traditional criteria for Federal Financial Aid eligibility are not part of the state’s alternative design.
- Finally, robust student services including those featured here are required to be offered. This includes a multidimensional assessment.

Recommended elements are:

- HSE co-enrollment is recommended but not required. It’s our hope that institutions will be able to have co-enrolled students through mechanisms such as ICAPS.
- Utilize ATB during Integrated Education and Training implementation. In Illinois, these are also called ICAPS.

FREQUENTLY ASKED QUESTION ABOUT PARTICIPATING IN THE STATE PLAN

FAQ: Does an institution have to participate in the plan in order to utilize the two currently approved ATB methods (standardized test / 6 college credit hours)?

A: No, institutions are currently allowed to utilize Ability to Benefit through the two currently approved methods, as authorized by the Higher Education Act, without participating in the State’s Alternative Plan Process.

FREQUENTLY ASKED QUESTION ABOUT HSE

FAQ: How does the Department of Education determine whether a program enables an individual to attain a secondary school diploma or its recognized equivalent?

A: Under Section 484(d)(2)(F) of the HEA, an eligible career pathway program must enable a student to attain a secondary school diploma or its equivalent. In determining whether an eligible career pathway program meets this requirement, the Department considers whether the program provides this opportunity in a way that is reasonably accessible to enrolled students, such as by offering instruction through distance learning (including through synchronous or asynchronous modalities) and offering a range of instructional options that are reasonably convenient for students. The Department will accept reasonable institutional scheduling decisions relating to this matter.

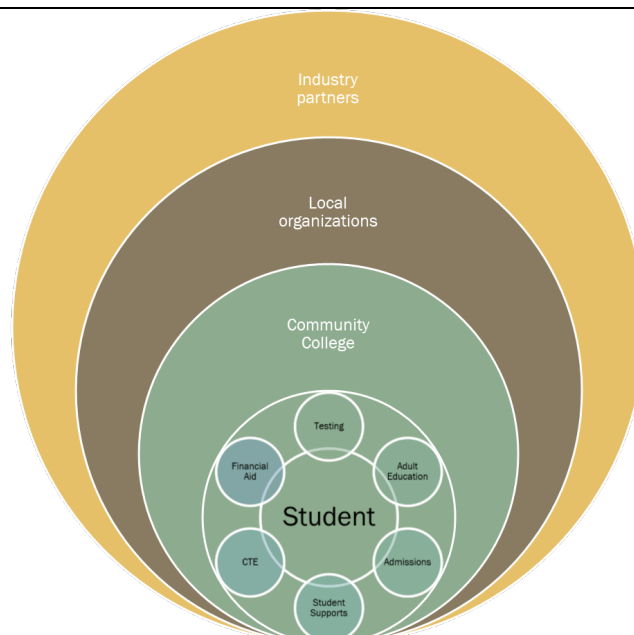
FAQ: Is an eligible ATB student required to complete a secondary school credential as a part of their program?

A: No. A student who seeks Title IV eligibility under the ATB alternatives (ATB student) enrolled in an eligible career pathway program *must have the opportunity* as part of the program to attain a secondary school diploma or its recognized equivalent. A career pathway program would be considered eligible for the purposes of the Title IV aid programs, as described in Section 484(d)(2)(F) of the HEA, if students enrolled in the eligible career pathway program do not obtain a high school diploma or its recognized equivalent, even if they have finished the requirements for earning a postsecondary credential. It is important to note, however, that completion of an eligible career pathway program does not enable a student to subsequently become Title IV eligible as a non-ATB degree seeking student unless that student completes the high school diploma portion of the eligible career pathway program or earns a GED certificate or another recognized equivalent of a high school diploma.

Aligning ATB Processes with College and Workforce Functions

Leadership support in growing and aligning the use of ATB is critical as it has a direct correlation on the amount of resources, time, and tools made available to build and scale the ATB processes within your institution. A designated champion group for ATB can also support the growth of ATB by allowing a department or individual to fill the roles of facilitator and/or liaison depending on the needs at your institution. Ideally, the champion is a department/individual that interacts regularly with the other offices involved in the ATB processes (i.e., Student Navigator). A common link between these areas of your institution will provide the intake, assessment, documentation, and support necessary to ensure that the student is successful.

Figure 1: Cross-functional Team for ATB



When building an ATB champion team at your college, consider a cross-functional team; including members from all parts of the college noted in Figure 1. When building a team and identifying a champion at your college, we encourage you to find the best person/persons to use the tool as it will be different college to college.

As we know, prospective students are likely to interact with one or more areas of the college so many champions can ensure that students have access to information and positive experiences as they begin or continue their education. Explore ways that potential ATB students contact your college to learn more about completing a high school credential or equivalency. These are the dialogues that can also explore how they can finish their high school equivalency and concurrently enroll in a program if that is also one of the individual's goals.

To assist you in this cross-functional alignment, see the [ATB Checklist](#) and [ATB Planning Tool](#) in this Guide.

College Responsibilities

There are multiple responsibilities the college will have in implementing the state's alternative ATB plan at the local level. These responsibilities are primarily: documentation, assessment, orientation, wraparound services, and identification of eligible students and pathways.

Eligible career pathway programs must fall within one of Illinois 17 Career Clusters as identified in the Illinois State Perkins V Plan. Institutions should prioritize 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 Figure 2 of this document.

Additionally, institutions must ensure that funds are only used on approved Eligible Career Pathway Programs (ECPP), submitted via EApp for Title IV fund use. ECPP components include:

1. Skill/Industry alignment

ECPP align 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. Colleges will provide documentation of skill needs of local, regional, or state labor market using data from the Illinois Department of Employment Security, local industry feedback, Workforce Innovation Board reports, or similar evidence to support the development of the ECPP.

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

3. 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)).

Please note: Participants must enroll in an approved ECPP, 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.

4. 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.

5. 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.

Documentation/Annual Implementation Reports due August 30 each year

Data collection will occur through student-level data submissions in the ICCB Centralized Data System. Ability to Benefit designation was added to the MIS Manual for the fiscal year that started July 1, 2022. Use this designation in your institutional research reporting. In addition to this data, colleges will be required to keep documentation of ATB required components and activities, and submit an Annual Implementation Report, due August 30 each year. 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, 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. Participating colleges must maintain a success rate that is within 85% of the success rate of students with high school diplomas.

Student eligibility

Student eligibility is particularly important since Title IV funds are being attached to students in Ability to Benefit. Colleges must ensure that eligible students are adult learners who meet all of the other eligibility criteria for federal financial aid, but not the criteria for traditional ATB. Ideal candidates are students currently enrolled in high school equivalency programming and students who have successfully completed a Bridge Program within Adult Education. Be sure to spend some time considering methods your institution has for capturing and documenting this information. Eligibility needs to be documented in a way that is easy to tabulate and report on annually.

Success Rate Calculation

First, calculate the rate for students with high school diplomas:

NUMERATOR: 800 students with HSD/E enrolled in participating institution in education and training that academic year AND either (1) successfully completed their program, (2) remained enrolled at the end of the AY, or (3) successfully transferred and remained enrolled at the end of the AY.

DIVIDED BY

DENOMINATOR: 1000 students with HSD/E who enrolled in participating institution in education and training programs that AY, (excludes students who withdrew or were expelled during the AY and who received a 100 percent tuition refund).

Success Rate for those with High School Diplomas: $800/1000 = 80\%$

Second, calculate the rate for students without high school diplomas:

NUMERATOR: 13 students without HSD/E enrolled in participating institution in education and training that academic year AND either (1) successfully completed their program, (2) remained enrolled at the end of the AY, or (3) successfully transferred and remained enrolled at the end of the AY.

DIVIDED BY

DENOMINATOR: 19 students without HSD/E who enrolled in participating institution in

education and training programs that AY, (excludes students who withdrew or were expelled during the AY and who received a 100 percent tuition refund).

Success Rate for those without High School Diplomas: $13/19 = 68.4\%$

Finally, calculate the overall success rate for those without HSD.

NUMERATOR: Success rate for those without HSD (.684)

DIVIDED BY

DENOMINATOR: Success rate for those with HSD (.80)

ATB Alternative Plan success rate= $.684/.80 = 85.5\%$.

This number must be 85% of success rate for those with HSD to be compliant with the Plan. In this example, the institution meets the Success Rate required for the State Alternative Plan.

Assessment

An assessment utilizing multiple measures is required in the state's alternative plan. This may include GED practice tests, instructor referrals, HSE and ESL assessments, and writing samples.

Assessment of each student's existing capabilities through means other than a single standardized test is required by the US Department of Education.

Combinations of the following methods should be considered:

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

Consider combinations that demonstrate post-secondary readiness and account for gaps in the traditional process, for example: combining a GED Ready Test scored and a teacher recommendation, Or successful completion of an ESLTP program and a successful student interview.

The evidence selected must be documented in the student's Ability to Benefit file. Please note that this information may be requested as part of a monitoring process of the ICCB.

Eligible Career Clusters

Illinois has identified 17 Career Clusters in the Illinois State Perkins V Plan. Institutions must align their Eligible Career Pathway Program within these clusters. One specific strategy within a career pathway is integrated education and training (IET). 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.

Figure 2: Illinois' Career Clusters

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

Monitoring, Corrective Action, and Termination

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.

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 81-84% 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 85%, the institution is removed from the Watch List and placed in good standing. If the institution continues to have less than the required 85% success rate, they will need to submit a Corrective Action Plan. If an institution has a Success Rate of 80% or lower, the program will complete a Corrective Action Plan. If an institution reports a success rate of less than 85% for three consecutive years, the institution will be terminated from participating under this State-Defined Plan.

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 six 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 six credit hours and therefore eligible for ATB through that policy option.

Ability to Benefit Resources

1. [Illinois State-Defined Alternative Plan](#)
2. [Illinois Plan's Approval Letter from US Department of Education](#)
3. [FAQs about the Illinois Plan](#)
4. [US Department of Education on ATB](#)
5. [US Department of Education on applying for ECPP](#)
6. [The Center for Law and Social Policy, ATB](#)
7. [World Education on EApp for ECPP](#)

Sample Ability to Benefit Checklist

Student Name: _____

Advisor: _____

Student ID: _____

Student Email : _____

HS Completion Option:

- ☐ HSE exam (GED or HiSet)
- ☐ Transcript-Based Alternative Methods of Credentialing

Activity	Responsible	Initials & Date Completed
Complete EApp for ECPP	Fin Aid staff	
Determine Program Pathway: _____	Student and Advisor	
Apply for Admission	Student and Advisor	
Meet with Financial Aid Specialist, confirm Pathway is eligible	Student & Advisor	
Apply for Financial Aid	Student & Fin Aid staff	
Determine required documents for assessment	Student & Advisor	
Collect and submit documents for assessment	Student	
Schedule appointment with Advisor	Student	
Review ATB Results with advisor	Student and Advisor	
Confirm eligibility for ATB with Financial Aid office	Student	

Ability to Benefit Planning Tool

The Ability to Benefit Planning Tool has been developed to help individual colleges, if they choose, establish a baseline for alignment of their internal and external processes as it relates to ATB. The tool is organized into two groups of elements (Internal vs. External). You have opportunity to examine each consideration with these two groups by noting the current status, assessing your current state, and identifying next steps for enhancement.

ATB Planning Tool

Internal Considerations	Current State: <i>Note the current state of this element.</i>	Not Applicable	No Action Yet	In Progress	Implemented	Next Steps: <i>Note next action steps for enhancing this element.</i>
Internal Elements to Consider						
a. The college has leadership support to fully utilize the provisions of Ability to Benefit (ATB).						
b. The college has a mechanism to engage all parts of the institution around a collaborative strategy to expand the use of ATB.						
c. The college offers academic support services such as tutoring, study skills training and mentoring to support ATB students.						

d. The college has a mechanism to inform ATB students of available support services.						
e. The college's processes align in such a way that all potential ATB students can quickly and efficiently find the information they need.						
f. The college has a process to monitor ATB student progress toward completing their High School Equivalency and program requirements.						
g. The college has connections with community and/or workforce partners to assist the student in accessing wrap-around support services such as financial aid, scholarships, childcare assistance, transportation assistance, food assistance and healthcare assistance.						
h. Other factors specific to your institution:						

External Considerations	Current State: <i>Note the current state of this element.</i>	Not Applicable	No Action Yet	In Progress	Implemented	Next Steps: <i>Note next action steps for enhancing this element.</i>
External Elements to Consider						
a. The college has a process around community engagement and has identified the key stakeholders in workforce, industry, and the community.						
b. The college has a process in place to engage stakeholders for outreach and referral of students who can benefit from ATB.						
c. The college has a strategy or plan to strengthen and maintain partnerships with external stakeholders.						
d. The college has a strategy or plan to engage business and other industry stakeholders to ensure that ATB options align with in-demand career pathways.						
e. Ability to Benefit options are promoted externally and in collaboration with the college marketing department.						



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