



Illinois Ability to Benefit Alternative State Plan

Submitted to the U.S. Department of Education for renewal, November 15, 2025



Table of Contents

Executive Summary	3
Background	5
Requirements for All State Process Institutions	6
1. Participating Institutions (a)(2)(i)	6
2. Program Requirements to Offer ATB via State Plan (a)(2)(ii)	6
3. Student Eligibility Criteria (a)(2)(iv)	7
4. Eligible Career Pathway Program (ECPP) (a)(2)(iii)	8
Subsequent State Process Application, Additional Requirements	9
1. First time institutional guarantee (a)(2)(v)	9
2. Data Collection and Reporting (c)(2) and (c)(3)	9
3. Monitoring, Corrective Action, and Termination	10
4. Success Rate (e)(1) and (j)(1)(iii)	10
5. Economic Circumstances for typical Student enrolled in the State process (e)(3)	12
Appendix A—List of all Eligible Institutions	13
Appendix B - Allowable Career Clusters in Illinois	14

Executive Summary

The purpose of Illinois' Ability to Benefit Alternative State Plan is to outline the 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 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 (29U.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 methods¹. 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. A follow-up survey was conducted in the fall of 2023 after initial approval of the State-Defined Process. While institutions no longer described earlier limitations of implementing ATB, current available grant funding was serving as a disincentive to implement the state plan during the initial period.

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

1. Participating institutions of higher education
2. Program design to support Eligible Career Pathway Programs
3. Student eligibility
4. Required elements of Eligible Career Pathway Programs, including, but not limited to:
 - A) Tutoring;
 - B) Career Goal Development;
 - C) Counseling; and,
 - D) Follow Up.

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

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

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 its 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*² 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 continues to be 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 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"³. To aid Illinois in achieving this goal, the ICCB Adult Education and Literacy funded programs provided more than 56,000 adult learners with career services instruction in Fiscal Year 2023, an increase of 33% over the previous year⁴ and comprising 11% of the credit-generating students system wide⁵. Of these students, 59.4% identified as female⁶. 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 aged

² https://www.iccb.org/iccb/wp-content/pdfs/adulted/publications_reports/ICCB_AE_Strategic_Plan_Draft_1-4-18.pdf

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

⁴ https://www.iccb.org/wp-content/pdfs/adulted/publications_reports/FY2023_Adult_Education_and_Literacy_Report_to_the_Governor_and_General_Assembly%20FINAL.pdf

⁵ https://www2.iccb.org/data/wp-content/uploads/2023/12/Annual_Enroll_Comp_2023.pdf

⁶ https://www.iccb.org/wp-content/pdfs/adulted/publications_reports/FY2023_Adult_Education_and_Literacy_Report_to_the_Governor_and_General_Assembly%20FINAL.pdf

18 and over are in need of a high school credential, equivalent to 10.8% of the State's population. Illinois is currently laying the groundwork for a new attainment goal following the closeout of 2025.

Part of demonstrating the effectiveness of an ATB-eligibility process requires considering the 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.

Requirements for All State Process Institutions

1. Participating Institutions (a)(2)(i)

In total, 36 institutions will participate in the plan. Thirty-six of the original Illinois Community College Board (ICCB) institutions who opted in for the initial plan approval renewed their interest to participate in this plan. See Appendix A for a complete list of these participating ICCB institutions.

2. Program Requirements to Offer ATB via State Plan (a)(2)(ii)

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 Dictionary⁷. 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 the 17 Career Clusters as identified in the Illinois State Perkins V Plan⁸. Institutions should prioritize programs of study that lead to occupations that are high-skill, in-demand, and high-wage, using government reports, information obtained on local needs from their industry partners, and other sources demonstrating direct engagement with industry. 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; (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, and (3) that the career pathway has been approved by the Secretary as an Eligible Career Pathway Program .

One specific strategy within a career pathway is integrating education and technical training. Illinois uses its Integrated Career and Academic Preparation System (ICAPS) for the development, implementation, and

⁷ https://icsps.illinoisstate.edu/images/pdfs/CTE/Perkins_V/6Perkins_V_Resource_IL-Career-Pathways-Dictionary.pdf

⁸ <https://www.iccb.org/cte/perkins-v-state-plan/#:~:text=What%20is%20the%20Illinois%20Perkins,%2D%20June%2030%2C%202024>

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 was provided by the ICCB and its partners prior to and during the first two years of implementation to help promote programmatic success. This included a series of webinars, four recorded mini-modules, and the creation of a guidebook. Ongoing professional development, technical assistance, and monitoring will be offered throughout the period of the plan.

3. Student Eligibility Criteria (a)(2)(iv)

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:

- are enrolled in an ICCB approved Alternative Methods of Credentialing for High School Equivalency⁹ programming OR
- have successfully completed a Bridge Program within Adult Education.

Assessment of each student's existing capabilities through means other than a single standardized test will also be conducted utilizing multiple measures of assessment. Institutions will 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

⁹ https://www.iccb.org/adult_ed/illinois-high-school-equivalency/students-test-takers/transcript-based-alternative-methods-of-credentialing/

4. Eligible Career Pathway Program (ECPP) (a)(2)(iii)

An institution demonstrates to the Secretary that a student is enrolled in an Eligible Career Pathway Program:

- The program aligns 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
- The skill needs align with the specific coursework and postsecondary credential provided by the postsecondary program or other required training;
- The program provides academic and career counseling services that assist students in pursuing their credential and obtaining jobs aligned with skill needs described and identifies the individuals providing the career counseling services;
- The appropriate education is offered, concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster through an agreement, memorandum of understanding, or some other evidence of alignment of postsecondary and adult education providers that ensures the education is aligned with the students' career objectives; and
- The program is designed to lead to a valid high school diploma as defined in § 668.16(p) or its recognized equivalent.

1. The program aligns 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)).

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.

Subsequent State Process Application, Additional Requirements

1. First time institutional guarantee (a)(2)(v)

There were no first-time institutions joining the state plan renewal.

2. Data Collection and Reporting (c)(2) and (c)(3)

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 all the 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, 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.

3. Monitoring, Corrective Action, and Termination (c)(5) and (c)(6)

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

Monitoring

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.

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 an 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.

Termination Clause

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 will be prohibited from participating in the State process for at least five years. However, 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.

4. Success Rate (e)(1) and (j)(1)(iii)

Requirements: ATB enrolled students must have a success rate that is within 85 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 an 85% success rate will follow corrective action planning as identified in this plan. 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 without 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 85% of the success rate for the peer group (students with a high school diploma or equivalent).

Success rates were calculated for students at one institution where the State process was used in the 2024/2025 academic year. This rate was 100%, so no comparison data was necessary.

Institution	ATB state plan success rate	Peer group success rate	% of success rate state plan/peer group
Parkland College	3/3 students*=100%	N/A	N/A

* Students in ATB State Process are continuing on in their career pathway at the college.

5. Economic Circumstances for typical Student enrolled in the State process (e)(3)

Overall educational attainment and economic circumstances typical of a student enrolled in the State process are not available at this time because students enrolled in the State process were in their first semester. This data will be collected as part of the annual report moving forward.

Appendix A—List of all Eligible Institutions

1. Black Hawk College
2. Carl Sandburg College
3. City Colleges of Chicago—Harold Washington
4. City Colleges of Chicago—Harry S. Truman
5. City Colleges of Chicago—Kennedy-King
6. City Colleges of Chicago—Malcolm X
7. City Colleges of Chicago—Olive-Harvey
8. City Colleges of Chicago—Richard J. Daley
9. City Colleges of Chicago—Wilbur Wright
10. College of Lake County
11. Elgin Community College
12. Harper College
13. Heartland Community College
14. Highland Community College
15. Illinois Central College
16. Illinois Eastern Community Colleges
17. John A. Logan College
18. John Wood Community College
19. Joliet Junior College
20. Kaskaskia College
21. Kishwaukee College
22. Lewis & Clark Community College
23. Lincoln Land Community College
24. Moraine Valley Community College
25. Morton College
26. Parkland College
27. Prairie State College
28. Rend Lake College
29. Rock Valley College
30. Sauk Valley Community College
31. Shawnee Community College
32. South Suburban College
33. Southeastern Illinois College
34. Southwestern Illinois College
35. Triton College
36. Waubesa Community College

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