

Program-Specific Requirements for Adult, Dislocated Worker, and Youth Activities under Title IB

VI. Program-Specific Requirements for Core Programs

The State must address all program-specific requirements in this section for the WIOA core programs regardless of whether the State submits either a Unified or Combined State Plan.

Program-Specific Requirements for Adult, Dislocated Worker, and Youth Activities under Title I-B

The Unified or Combined State Plan must include the following with respect to activities carried out under subtitle B--

a. General Requirements

1. Regions and Local Workforce Development Areas

A. Identify the regions and the local workforce development areas designated in the State.

For purposes of WIOA, the 102 counties in Illinois are grouped into ten Economic Development Regions (EDR) and twenty-two (22) Local Workforce Innovation Areas (LWIA). The regions range from a relatively compact four counties in the Northern Stateline region to the much larger nineteen (19) county Southern region.

The 22 LWIAs range from six (6) single-county LWIAs to an area with 14 counties. All but one of the single-county LWIAs are in the Northeastern Economic Development Region that covers the greater Chicagoland area. There are a small number of instances where the EDRs cross LWIA boundaries. The Governor designated ten EDRs that are also used for the purposes of alignment with workforce development. Here is a list of counties in each region:

- Region 1 (Central (12 counties)) - Cass, Christian, Greene, Logan, Macon, Macoupin, Menard, Montgomery, Morgan, Sangamon, Scott, Shelby Counties.
- Region 2 (East Central (6 counties)) - Champaign, Douglas, Ford, Iroquois, Piatt, Vermilion Counties.
- Region 3 (North Central (10 counties)) - De Witt, Fulton, Livingston, McLean, Marshall, Mason, Peoria, Stark, Tazewell, Woodford Counties.
- Region 4 (Northeast (10 counties)) - Cook, De Kalb, Du Page, Grundy, Kane, Kankakee, Kendall, Lake, Mc Henry, Will Counties.
- Region 5 (Northern Stateline (4 counties)) - Boone, Ogle, Stephenson, Winnebago Counties.
- Region 6 (Northwest (10 counties)) - Bureau, Carroll, Henry, Jo Daviess, La Salle, Lee, Mercer, Putnam, Rock Island, Whiteside Counties.
- Region 7 (Southeastern (13 counties)) - Clark, Clay, Coles, Crawford, Cumberland, Edgar, Effingham, Fayette, Jasper, Lawrence, Marion, Moultrie, Richland Counties.
- Region 8 (Southern (19 counties)) - Alexander, Edwards, Franklin, Gallatin, Hamilton, Hardin, Jackson, Jefferson, Johnson, Massac, Perry, Pope, Pulaski, Saline, Union, Wabash, Wayne, White, Williamson Counties.
- Region 9 (Southwestern (9 counties)) - Bond, Calhoun, Clinton, Jersey, Madison, Monroe, Randolph, St. Clair, Washington Counties.
- Region 10 (West Central (9 counties)) - Adams, Brown, Hancock, Henderson, Knox, McDonough, Pike, Schuyler, Warren Counties.

In looking at the map of Illinois' EDRs and LWIAs one will notice the 22 local areas are numbered up to "26". This is due to local area consolidations that have taken place in recent years. To reduce confusion among state

and local stakeholders, it was decided to use the lowest number of the consolidating areas. One will notice local areas 8, 9, 12 and 16 no longer appear on the map. The map is also provided as Attachment S at www.illinoisworknet.com/wioastateplan.

The current LWIA boundaries trace their origins back to the Comprehensive Employment and Training Act program of the 1970s. Through the transitions to the Job Training Partnership Act, Workforce Investment Act and now WIOA, the LWIA boundaries remained largely unchanged, save for the consolidations mentioned previously.

The Governor established ten Economic Development Regions (EDR) in 2003 based on contemporary economic data. These regional boundaries were reexamined in 2015 and 2017 based on the latest economic data and were found to still be valid. While the EDR boundaries largely follow the pre-existing LWIA structure, the overlay is not 100 percent and there are a handful of outlier counties which cause their LWIA to cross into another EDR. These counties are: Calhoun, DeWitt, Douglas, Ogle, Jersey and Livingston.

The State is requesting a waiver, described further later in this section, to extend the deadline for bringing LWIA boundaries into full alignment with the EDRs. Meaningful planning efforts require a tremendous amount of partner resources. The realignment consultation process will effectively initiate a rigorous planning process for 2020 state, regional and local plans.

B. Describe the process used for designating local areas, including procedures for determining whether the local area met the criteria for “performed successfully” and “sustained fiscal integrity” in accordance with 106(b)(2) and (3) of WIOA. Describe the process used for identifying regions and planning regions under section 106(a) of WIOA. This must include a description of how the State consulted with the local boards and chief elected officials in identifying the regions.

Procedures for Determining if Local Areas Met the Criteria for “Performed Successfully”

Illinois issued the Workforce Innovation and Opportunity Act (WIOA) Transition Policy 1 to address the initial designation of local areas as required by WIOA and Training and Employment Guidance Letter (TEGL) Number 27-14 that was issued by the United States Department of Labor (DOL). The process for designating Local Workforce Innovation Areas (LWIA) under WIOA was established by WIOA Transition Policy 1, issued on April 23, 2015 (see Attachment L at www.illinoisworknet.com/wioastateplan). This policy letter describes conditions necessary for the Governor to approve a request to designate an area, defines “performed successfully” and “sustained fiscal integrity” as required by the Act. “The term “performed successfully” used with respect to a local area, means the local area met or exceeded the adjusted levels of performance for core indicators of performance described in Section 136(b)(2)(A) of the Workforce Investment Act of 1998, as in effect the day before the date of enactment of WIOA for each of the last two (2) consecutive years for which data are available preceding the determination of performance under this paragraph;” “The term “sustained fiscal integrity”, used with respect to a local area, means that the Secretary of Labor has not made a formal determination, during within of the last two (2) consecutive years preceding the determination regarding such integrity, that either the grant recipient or the administrative entity of the area misappropriated funds provided under Title I of the Workforce Investment Act of 1998 (as in effect prior to the effective date of WIOA subtitle B) due to willful disregard of the requirements of the provision involved, gross negligence, or failure to comply with accepted standards of administration.” The conditions necessary for the governor to designate a local area as described in the policy letter are:

- The local area was designated under the Workforce Investment Act of 1998 on or before July 1, 2012.
- The local area successfully met or exceeded adjusted performance requirements for core indicators under Section 136(b)(2)(A) of the Workforce Investment Act of 1998 for each of the most recent two consecutive years for which data are available.
- The local area did not receive a declaration of having failed to sustain fiscal integrity for the two prior program years by the Secretary of Labor.
- All county Chief Elected Officials (CEO) within a current LWIA, following a review of all current operations of the local area and by signature on the request, agree to all matters regarding the request

for designation by the state of the current local area. The majority (20 of 22) of the local workforce areas in Illinois met the criteria outlined in Section 1.A of TEGL 27-14. All the Chief Elected Officials that met these criteria, in consultation with the local workforce boards, submitted a request to be designated as a local area under WIOA.

Procedures for Determining if Local Areas Sustained Fiscal Integrity

In determining whether the grant recipient/administrative entity in the local area sustained fiscal integrity, the Department of Commerce and Economic Opportunity reviewed the following for the two-year period immediately preceding Program Year 2015: 1) Formal determinations of disallowed costs and non-compliance as documented by reports of the results of the state's WIA/WIOA monitoring, single audits and DOL monitoring (if applicable); 2) Results of investigations of incident reports alleging gross negligence, fraud, abuse or other misconduct; and 3) Formal communication of high-risk status and/or suspension of cash payments resulting from continued violations of administrative requirements and grant terms and conditions and the subsequent corrective actions implemented by the local area to correct the violations. The implementation of the Illinois Grant Accountability and Transparency Act will also establish standard pre-award, establishment and grant administration procedures across all state agencies. This will add another set of tools that will be used to ensure that the grant recipient sustains fiscal integrity.

Process Used to Determine Regions and Planning Regions

Regional Planning Areas were designated to align with the state's ten Economic Development Regions (EDR). These ten regions address the WIOA Section 106 requirement that the Governor identify and organize local workforce boards and core program partners into regional planning areas to engage in joint planning, coordinate service delivery, share administrative costs and enter regional coordination efforts with economic development agencies operating in the same region. The ten regions were first established in 2003 by the Governor based on the analysis of statewide commuting patterns surrounding major and minor metropolitan centers and other economic factors.

The state completed a new analysis in 2015 and 2017 and the data confirmed this regional alignment is still appropriate. In early 2015, the Department collaborated with the Illinois Community College Board on creating a strategic plan for workforce and education. The Illinois Department of Commerce and Economic Opportunity (Commerce) and the Department of Employment Security (Employment Security) and the Illinois Community College Board (ICCB) made the local areas and community college districts aware the data indicated the EDRs were still valid. Furthermore, we jointly announced our intent to strengthen the linkages of all our efforts to economic development by using these regions as the base for community college and WIOA planning regardless of community college district and LWIA alignments. As part of the ICCB planning, data packets for each region were prepared that included a map showing how the community college districts and LWIAs overlapped with the planning regions (See Attachment M at www.illinoisworknet.com/wioastateplan). To promote continuity from the ICCB planning, these data packets are also being used by WIOA regional planning teams.

The Governor has approved the requests for twenty LWIAs for initial designation using the aforementioned criteria. The CEOs of the remaining two local areas (LWIAs 4 and 15), in consultation with the local workforce boards, submitted a request letter under Section 1.B of TEGL 27-14, which provides that under the following conditions, the Governor may approve a request for initial designation as a LWIA under WIOA from any area that was designated as a local area under the Workforce Investment Act of 1998, but failed to meet all requirements of Section 1.A above. Each of these areas was involved in a consolidation with an adjacent local area during the time frame set forth, and each would have been eligible to apply under Section 1.A had their performance data not been impacted by the local area being absorbed.

C. Provide the appeals process referred to in section 106(b)(5) of WIOA relating to designation of local areas.

Illinois WIOA Transition Policy 1 provides that the Governor's decision regarding local area requests for initial designation may be appealed in accordance with Sections 679.290 of the Notice of Proposed Rulemaking. The policy also describes conditions under which the governor may approve a request for initial

designation as a local workforce development area under WIOA from any area that was designated as a local area under the Workforce Investment Act (WIA) of 1998, but failed to meet all the aforementioned requirements; and conditions under which the governor may also designate a local workforce development area upon the request of the State Workforce Development Board.

Furthermore, the policy describes the appeals process that may be used should a local area disagree with governor's determination and provides an application form to be filed by local area CEOs. Local areas may appeal to the Illinois Workforce Innovation Board, which has 60 days to render a decision. If a decision has not been made by that time or if the appeal does not result in a designation, the entity may appeal to the Secretary of Labor.

There were no local workforce areas that appealed the Governor's decision regarding initial designation.

D. Provide the appeals process referred to in section 121(h)(2)(E) of WIOA relating to determinations for infrastructure funding.

The appeals process relating to the determinations for infrastructure funding is outlined in the Governor's guidelines, included as Attachment H (www.illinoisworknet.com/wioastateplan). The appeals process is mentioned in Section 6 and Item 12 in the Glossary.

Local areas may appeal the governor's determination on the sharing of one-stop infrastructure costs on the basis the determination is inconsistent with federal proportionate share requirements or the federal cost contribution caps. The appeal must be made within 21 days of the governor's determination. Any appeal under this section is to be filed with the Interagency Work Group, which has thirty days to rule on the appeal. Should the plaintiff wish, the local area CEO(s) may request the Illinois Workforce Innovation Board to hear its appeal. The Board has thirty days to either hear the appeal and render a decision or inform the plaintiff of its decision to not hear the appeal. In instances where the Board refuses to hear the appeal the determination of the Interagency Work Group stands.

2. Statewide Activities

A. Provide State policies or guidance for the statewide workforce development system and for use of State funds for workforce investment activities.

The Department of Commerce and Economic Opportunity (Commerce) oversees the administration of the Workforce Innovation and Opportunity Act (WIOA) Title IB and Trade Adjustment Assistance Training programs. As administrator, Commerce issues policy guidance through its series of policy letters and notices that are posted on the Illinois workNet portal (<https://www2.illinoisworknet.com/WIOA/Resources/Pages/WIA-WIOAPolicies.aspx>). Commerce has issued guidance on the implementation and administration of WIOA for the following activities:

- Data Management and Reporting
- Fiscal Reporting and Accountability
- General Administration
- Governance
- Performance Management
- Planning
- Program Eligibility
- Training

More specifically, the following policies have been developed and issued through Commerce's Office of Employment and Training (OET):

- Guidance was issued to provide the Local Workforce Innovation Boards (LWIB), Local Workforce Innovation Areas (LWIA), core partner programs, service and training providers, sub-grantees and

other interested parties with an overview of the implementation steps Commerce, primarily through OET, has taken to implement the provisions of WIOA. This insured a seamless transition for the customers during intake and the continued provision of career and training services, including the expanded training services described in WIOA. This guidance also addressed reporting requirements during and after the transition period as changes to the workforce data reporting system, Illinois Workforce Development System (IWDS), is being updated.

- Membership and certification of LWIBs under WIOA is governed under new policies that are consistent with the new provisions including the assurance of more streamlined boards, but with a majority of business members and minimum percentage of labor and community service organizations represented. Emphasis was placed on ensuring the business representatives reflect the regional industry sectors, labor market information (LMI) and the diversity among populations. This policy provided new forms for completion for nominated applicants to the board, as well as reiterated the process for appointees with fixed and staggered terms. Certification (and recertification) of the boards is conducted by OET only after a review of the requisite information on each local board member to ensure appropriate composition is maintained. This process further includes reviews of LWIB bylaws, and compliance with the Sunshine Provision and parliamentary procedures.
- Policy was implemented to address chief elected officials (CEO) in each LWIA to include an understanding of their required functions, which is confirmed through a CEO agreement signed by each CEO in the LWIA. The agreement further addresses those LWIAs that have multiple CEOs when there is more than one unit of general local government residing within the boundaries of the area. CEOs are given the authority as the local grant recipient, including the authority to designate local grant subrecipients and fiscal agents for the Title IB funds of WIOA. It also defines each CEO's liability for WIOA funds determined to be misspent or used for unallowable purposes.
- Eligibility policies have been written to ensure all the requirements of WIOA are clearly outlined for the local areas and their staff providing the intake and registration of customers. ALL customers of the system, whether served by local one-stop staff, through technology, or self-served, are included in the general eligibility policy. Those seeking more than self-service assistance are then determined eligible based on the funding stream they will be served under including the youth, adult and dislocated worker populations. Detailed descriptions of the eligibility requirements and documentation sources allowed confirming such eligibility decisions provide guidance to the career planner in their decision making. The documentation is further outlined to determine low-income status, veteran or qualified spouse of a veteran status, and identity and employment eligibility. Priority of service is emphasized throughout to ensure veterans preference is provided over non-veterans who might otherwise be determined eligibility under a particular program.
- WIOA policy was issued to provide guidance to all training providers (including new providers and those previously provided transitional eligibility) and the LWIB and LWIA on the process for determining eligibility of providers and training programs. Illinois has required LWIAs develop and implement local policies as necessary. The policy includes initial and continued eligibility of all providers, with separate guidance for those Registered Apprenticeships choosing to be added to the eligible training provider list (ETPL). In limited instances, there are exceptions for when a training provider is not required to apply for eligibility determination by the local boards. In addition to the IWDS system which is the main intake point for applications of eligibility by training providers and for their training programs, the state's online workforce system, Illinois workNet, will maintain information on all eligible training providers and their programs, as well as performance information as it becomes available. This list highlights those programs that meet the state's requirements for in-demand occupations. The current procedures are currently under review by a work group to address the performance collection requirements for all students, streamline the current approval process for

eligibility, and make suggestions for changes to the reporting system.

- The IWIB approved new procedures for communications between the board, its executive committee, and the interagency work group especially as they pertain to the continued implementation of WIOA. The State developed guidance and instructions regarding 1) Regional and Local Planning Requirements, 2) Governor's Guidelines to State and Local Program Partners Negotiating Costs and Services under WIOA, and 3) Criteria and Procedures for Certifying Comprehensive One-Stop Centers under WIOA. The State issued policy and procedures for the procurement of the One Stop Operator (OSO) as required by *Training and Employment Guidance Letter 15-16 (TEGL 15-16)*. The policy emphasizes the requirements of TEGL 15-16 and the contractual provisions in 2 CFR 200.318 through 200.326. Part of this requirement is for the LWIB and the selected *One-Stop Operator* to enter into a legally binding agreement which may take the form of a written contract or another type of agreement, such as a *Memorandum of Understanding (MOU)* which is explained in the Competition Requirements section below. Following Illinois WIOA assessment, the State updated the OSO policy and procedures and conducted a monitoring review of all OSO Agreements.
- Under a work group structure, Illinois continues development of new policy to address all the types of training services allowed under WIOA. The first of these training options to receive a new policy was on-the-job training (OJT). General requirements for all OJTs are outlined in the guidance, including eligibility of participants and employers, OJT contracts and it clarifies OJT can be used in concert with classroom training and apprenticeships. To ensure proper implementation, local workforce boards are required to set policy for OJTs. The employer reimbursement scale is detailed to both attract businesses and ensure they have a level of accountability to the training program and customer's success. Monitoring and evaluation guidance assures further accountability. A comprehensive list of all WIOA policies and guidance issued is provided in Attachment U at www.illinoisworknet.com/wioastateplan.
- Title IB Policy 15-WIOA-3.1 titled *Annual Allocation and Modification Requirement of WIOA Formula Grant Funds* provides guidelines by which the Title IB Workforce Innovation and Opportunity Act (WIOA) formula grants shall be established and modified. The State will provide additional guidance through an annual funding notice that includes information regarding on the formula allocations and any additional guidance that is applicable to the program year funds.
- Title IB Policy 10-PL-62 titled *Incentives and Sanctions for Performance* a required statewide activity policy related to the Title IB incentive bonus awards and sanctions associated with exceeding and failing negotiated performance standards. In addition, it provides the bonus incentive measures related to completion of training in a demand occupation and subsequent employment in that occupation.
- Title IB Policy 11-PL-01, Change 1 titled *Dislocated Worker Emergency Assistance Application* outlines a statewide Rapid Response policy to provide additional assistance to local areas that experience disasters, mass layoffs, or plant closings, or other events that precipitate substantial increases in the number of unemployed individuals, carried out in local areas by the State, working in conjunction with the local boards and the chief elected officials for the local areas.

B. Describe how the State intends to use Governor's set aside funding. Describe how the State will utilize Rapid Response funds to respond to layoffs and plant closings and coordinate services to quickly aid companies and their affected workers. States also should describe any layoff aversion strategies they have implemented to address at risk companies and workers

Commerce works with the IWIB and core partners to implement the strategies and activities outlined in the Unified Plan. Governor's set aside funding will be used as appropriate and available to support statewide

initiatives that support the vision, principles, goals and strategies articulated within the WIOA Unified State Plan. Projects must also align with the priorities outlined in the Regional and Local Workforce Plans. There are four general categories of activity that Illinois will support with these funds.

Sector Partnership Projects

- Implement new or expanded local and regional sector-based partnerships that increase the workforce investment system's capacity to provide critical training that aligns with the needs of businesses and industries. Activities include regional planning and sector strategies that will align resources to address skills and other needs of in-demand industries. Regional planning and sector strategies support participants by assessing the regional economic landscape to identify new or growing employment opportunities in the region. They also help ensure that partnerships and regional assets from the workforce investment system, industry, community colleges, labor unions, nonprofits, and other stakeholders are aligned and integrated under strategies that can be used to respond to economic shocks, such as plant closings, natural disasters, and long-term unemployment within the regional workforce.

Innovative Workforce Pilot and Research Projects

- Implementing innovative programs and strategies designed to meet the needs of business, which may include incumbent worker training programs, customized training, sectoral and industry cluster strategies and implementation of industry or sector partnerships, career pathway programs, microenterprise and entrepreneurial training and support programs, utilization of effective business intermediaries, layoff aversion strategies, activities to improve linkages between workforce partners, and other business services and strategies that better engage employers in workforce investment activities and make the workforce development system more relevant to the needs of State and local businesses.
- Developing or identifying education and training programs that respond to real-time labor market analysis; that utilize direct assessment and prior learning assessment to measure and provide credit for prior knowledge, skills, competencies, and experiences; that evaluate such skills and competencies for adaptability; that ensure credits are portable and stackable for more skilled employment and that accelerate course or credential completion.

Priority Population Projects

- Developing strategies for effectively serving individuals with barriers to employment and for coordinating programs and services among workforce partners. Projects may include, but are not limited to, the coordination of employment and training activities with:
- Child support services, and assistance provided by State and local agencies carrying out Part D of Title IV of the Social Security Act (42 USC 651 et seq.);
- Cooperative extension programs carried out by the Illinois Department of Agriculture;
- Programs carried out in local areas for individuals with disabilities, including programs carried out by State agencies relating to intellectual disabilities and developmental disabilities, activities carried out by Statewide Independent Living Councils established under section 705 of the Rehabilitation Act of 1973 (29 USC 796d), programs funded under Part B of Chapter 1 of Title VII of such Act (29 USC 796e et seq.), and activities carried out by centers for independent living, as defined in section 702 of such Act (29 USC 796a);
- Adult education and literacy activities, including those provided by public libraries;
- Activities in the corrections system that assist returning citizens as they reenter the workforce;
- Financial literacy activities.
- Supporting the development of alternative, evidence-based programs and other activities that enhance the choices available to eligible youth and encourage such youth to re-enter and complete secondary education, enroll in postsecondary education and advanced training, progress through a career pathway, and enter unsubsidized employment that leads to economic self-sufficiency.

Statewide Technical Assistance and WIOA Implementation Projects

- Providing technical assistance to local boards, chief elected officials, one-stop operators, workforce partners, and eligible providers in local areas, such as: the development and training of staff, identification and development of exemplary program activities, and assistance in abandoning less effective or less efficient but well-entrenched practices.
- Providing technical assistance to improve the integration of case management, training services, supportive services, business services, and employer engagement among workforce, education and economic development partners.

RAPID RESPONSE LAYOFF AVERSION

The Illinois Talent Pipeline Program uses statewide rapid response funds to train workers who can contribute to a company's growth and success. Projects funded under this program are intended to develop sustainable work-based learning programs to help Illinois companies retain and train current workers and hire new staff. The goal of a talent pipeline grant is to maintain a pipeline of hireable talent for the employer being served. Applications must address one or more of the Illinois Talent Pipeline activities listed below to be considered for funding.

- Projects that connect talent strategies with business needs.
- Layoff aversion projects that support businesses and workers that are impacted or at risk of being impacted by company closures or layoffs.
- Projects that expand work-based learning opportunities including apprenticeships for targeted populations.

A primary focus of the Illinois Talent Pipeline Program is to provide training services to businesses and workers impacted or at risk of being impacted by company closures or layoffs. Grantees will facilitate or provide skill upgrade training to WIOA eligible workers or incumbent workers at risk of dislocation as a layoff aversion strategy. The State of Illinois considers a layoff averted when:

- A worker's job is saved with an existing employer that is at risk of downsizing or closing; or
- A worker at risk of dislocation transitions to a different job with the same employer or a new job with a different employer and experiences no or minimal unemployment.

A successful layoff aversion program averts layoff costs and reduces the financial risks to the employer and community as well as the Unemployment Insurance benefit costs. Further, the worker continues paying payroll and other taxes which result in a win-win for all. Layoff aversion provides workers with new skills to retain their existing job or quickly transition to a new one and maintain financial stability. The value for employers is remaining competitive in the global economy and saving operational, overhead and productivity costs by training current, reliable employees rather than going through the process of replacing them. Applicants that administer layoff aversion projects are required to identify the factors that contribute to the "risk" of layoffs. Below are some of the "risk" indicators Illinois identified to determine if a business needs training assistance to maintain a competitive workforce.

- Declining Sales
- Supply Chain Issues
- Industry/Market Trends
- Changes in Management Philosophy or Ownership
- Worker Does Not Have the Necessary Skills
- Strong Possibility of a Job If a Worker Attains New Skills
- Other "At-Risk" Indicators

Illinois has long believed the best layoff aversion strategy is prevention. Layoff aversion begins as soon as a company realizes it must adjust to remain competitive in its market. Such adjustments could be streamlining operations for improved productivity or taking advantage of a market opportunity to increase profitability. Often these operational adjustments require upskilling incumbent workers and/or access to new skilled workers. The challenge lies in being able to help businesses before it's too late.

To that end, in 2017, OET staff developed and delivered a full-day workforce system training to the Department of Commerce Office of Business Development (BD). The intent of the training was to leverage BD front office and regional field staff connections and interactions with businesses to identify opportunities for early intervention of WIOA services. OET and BD staff concur that helping companies remain competitive is a high return-on-investment activity that directly impacts the ability of WIOA participants to obtain sustainable employment with options for upward mobility. To that end, our mutual goal is to help businesses access WIOA services and skilled workers so that they improve their competitive position and avoid the need for layoffs.

The specific goals met by this training were for Business Development staff to have a solid understanding of:

- workforce system core principles and key goals in the WIOA Unified State Plan
- basic WIOA program organizational structure
- career pathways
- sector strategies
- the relevance of business engagement with the workforce/education system
- WIOA core and required partner services and their relevance to businesses, especially work-based learning options
- regional data on leading, emerging and maturing industries
- gathering and using workforce intelligence
- communication strategies
- the importance of integrated, cross-program business services.

Post-training surveys indicated the Business Development staff found the training very helpful and relevant to their work. Since the training, the frequency and quality of communication between Business Development staff and OET and local workforce areas has increased.

C. In addition, describe the State policies and procedures to provide Rapid Responses in cases of natural disasters including coordination with FEMA and other entities.

The Department of Commerce is the lead state agency for coordinating rapid response activity in Illinois. The Rapid Response Team includes the Department of Commerce Rapid Response Staff, IDES Staff, Local Workforce Area Staff and other partners, as appropriate. These partners coordinate efforts to make impacted workers and businesses aware of available services, eligibility requirements and the application process.

The Illinois Worker Adjustment and Retraining Notification (WARN) Act, requires employers to provide a 60-day notice of pending plant closures or mass layoffs. The law applies to “business enterprises” with 75 or more employees (excluding part-time employees). A covered “mass layoff” under Illinois WARN is a reduction in force (“RIF”) at a single site of employment that is not the result of a “plant closing” and results in employment losses during any 30-day period (or, in some cases, during any 90-day period) for at least 33% of the employees and at least 25 employees, or at least 250 employees regardless of the percentage. While rapid response is required for closures and mass layoffs, it is the Department of Commerce’s policy that effective rapid response services are to be provided to as many workers and companies as possible. Rapid Response funds will be used to administer all the required and allowable activities outlined in WIOA as appropriate, including:

- Layoff aversion activities;
- Immediate and on-site contact with the employer, representatives of the affected workers and the local community;
- The provision of information and access to unemployment compensation benefits and programs, such as short-time compensation, comprehensive one-stop system services, and employment and training

activities, including information on the Trade Adjustment Assistance program, Pell Grants, the GI Bill, and other resources;

- The delivery of other necessary services and resources including workshops and classes, use of worker transition centers, and job fairs, to support reemployment efforts for affected workers;
- Partnership with the local board(s) and chief elected official(s) to ensure a coordinated response to the dislocation event and, as needed, obtain access to state or local economic development assistance. Such coordinated response may include the development of an application for a national dislocated worker grant as provided under WIOA;
- The provision of emergency assistance adapted to the layoff or disaster;
- Developing systems and processes for identifying and gathering information for early warning of potential layoffs or opportunities for layoff aversion, analyzing, and acting upon, data and information on dislocations and other economic activity in the state, region, or local area; and tracking outcome and performance data and information related to the activities of the rapid response program;
- Developing and maintaining partnerships with other appropriate federal, state and local agencies and officials, employer associations, technical councils, other industry business councils, labor organizations, and other public and private organizations, as applicable, to:
 - Conduct strategic planning activities to develop strategies for addressing dislocation events and ensuring timely access to a broad range of necessary assistance;
 - Develop mechanisms for gathering and exchanging information and data relating to potential dislocations, resources available, and the customization of layoff aversion or rapid response activities, to ensure the ability to provide rapid response services as early as possible;
- Delivery of services to worker groups for which a petition for Trade Adjustment Assistance has been filed;
The provision of additional assistance and funding to local areas that experience disasters, layoffs, or other dislocation events when such events exceed the capacity of the local area to respond with existing resources; and
Provision of guidance and financial assistance as appropriate, in establishing a labor management committee if voluntarily agreed to by the employee's bargaining representative and management. The committee may devise and oversee an implementation strategy that responds to the reemployment needs of the workers.

Natural disasters create more significant impacts than economically-driven layoffs because multiple facets of individuals' lives are disrupted, sometimes permanently and often without warning. Natural disasters in Illinois are typically related to: tornadoes, flooding, ice and snow, drought, and less frequently, earthquakes and fires. State rapid response staff mobilize upon learning that a natural disaster is underway to assist in the provision of allowable and appropriate services. The State reserves statewide rapid response funds that are available to quickly provide resources to the local workforce area(s) to serve eligible participants. In instances where the Federal Emergency Management Agency declares a *public assistance* disaster area the State will typically submit a National Dislocated Worker Grant.

D. Describe how the State provides early intervention (e.g., Rapid Response) to worker groups on whose behalf a Trade Adjustment Assistance (TAA) petition has been filed. (Section 134(a)(2)(A).) This description must include how the State disseminates benefit information to provide trade-affected workers in the groups identified in the TAA petitions with an accurate understanding of the provision of TAA benefits and services in such a way that they are transparent to the trade-affected dislocated worker applying for them (Trade Act Sec. 221(a)(2)(A) and Sec. 225; Governor-Secretary Agreement). Describe how the State will use funds that have been reserved for Rapid Response to provide services for every worker group that files a TAA petition.

The state will use the information developed by the interagency data team, feedback from regional sector partnerships and intelligence from economic development officials to expand layoff aversion efforts and respond to the needs of businesses before layoffs occur. As the Department of Commerce Office of Employment and Training receives notice of potential layoffs and petition filings, the Rapid Response team organizes and establishes logistics for informational meetings for Trade impacted and non-Trade Act impacted worker groups. The Rapid Response team includes partners from IDES and Title 1B administrators from the local workforce areas, as well as other partner programs based on worker and situational needs. The Benefits, Rights and Obligations, along with Unemployment Insurance (UI) and Trade Readjustment Assistance (TRA) and RTAA/ATAA benefits are covered at length with the affected workers. An overview of the Trade Adjustment Assistance benefits and services including the next steps if the petition is certified is presented. Since workers often times are not all scheduled for layoff on the same date, multiple workshops are held to provide the Trade specific information to the workers. Staff, including Title 1B, has access to updated Trade Program forms and information on Illinois workNet, and ongoing support and technical assistance from the Department of Commerce and the Department of Employment Security UI and Trade program staff.

Rapid Response Reserve funds are dedicated to layoff aversion strategies and to assist laid off workers. Layoff aversion strategies include the Talent Pipeline RFA opportunity through the Department of Commerce. The Talent Pipeline is designed to award grants for demonstration projects providing Rapid Response services to businesses and workers impacted or at risk of being impacted by company closures or layoffs. The goal of this program is to help businesses avoid layoffs where possible and help unemployed workers re-enter the workforce. Commerce is interested in investing in projects that specifically identify employers that serve WIOA-eligible dislocated workers from layoff events; projects for recently separated veterans; projects that connect employers and WIOA eligible dislocated workers with short-term, on-the-job and customized training programs; and registered apprenticeships before or after layoff and prior to new employment. The Department will consider incumbent worker projects to assist with training existing employees who are at-risk of being laid off without the training.

Training projects must provide workers with new skills to retain their existing job or quickly transition to a new one and maintain financial stability. The value for employers is remaining competitive in the global economy and saving operational, overhead and productivity costs by training current, reliable employees rather than going through the process of replacing them. For laid off workers, Rapid Response Reserve funds offer additional assistance for outreach and recruitment, training, supportive services and in the case of large layoffs, these funds also provide assistance for transition centers to add additional support for affected workers and accommodate serving higher volumes of individuals.

b. Adult and Dislocated Workers Program Requirements

1. If the State is utilizing work-based training models (e.g. On-the-job training, Incumbent Worker training, Transitional Jobs, and Customized Training) as part of its training strategy and these strategies are not already discussed in other sections of the plan, describe the State's strategies for how these models ensure high quality training for both the participant and the employer.

Work-based training is one of the highest priorities for Illinois under WIOA and is highlighted as a part of the annual formula funding notice as local workforce areas are required to break out and report on the work-based learning expenditures. The underlying advantage of work-based learning is that by definition, it incorporates skill competencies needed by the business. There is no doubt the trainees are learning the specific skills needed, and furthermore they are learning to apply skills in the way the employer prefers. This practically guarantees individuals that complete training are positioned to immediately add value in the workplace and have marketable skills to provide upward mobility in a career pathway.

Commerce has promoted a resurgence of on-the-job training going back several years using the National Emergency OJT Grant (NEG). Through investing in statewide rapid response set-aside we have been working to help local areas and businesses create a positive experience through OJT and work experience. Further, using the Workforce Innovation Fund (WIF) initiative, Commerce, ICCB, IDES and the Illinois

Manufacturer’s Association collaborated to promote combining work–based career exploration, paid work experience/internships, transitional jobs and OJT to create a continuum of services designed to allow participants to “earn and learn”. We also encouraged community colleges to collaborate with local workforce areas to create internship opportunities for eligible students before and upon graduation. This strategy is designed to ease participants and students into a paid position so they gain valuable real–world experience and the opportunity to demonstrate their essential skills to prospective employers.

WIOA was signed into law during the training cycle of Illinois’ WIF project; and we strongly encouraged local areas to take advantage of the opportunity to build business relationships and pilot test work–based training under WIF to prepare them for WIOA. Another strategy we have found helpful is to engage an industry intermediary that can facilitate work–based placements from the workforce system into its member businesses. The industry intermediary can speak the language of both worlds and “translate” between private and public sector to reduce communication breakdowns. Illinois has applied these promising practices to the program design of the statewide activities including the Talent Pipeline, Youth Career Pathways, and WIOA Statewide Innovation Programs.

Illinois recognizes that one of the best ways for local areas to help key industries remain globally competitive and establish good relationships with businesses is through incumbent worker training projects. Illinois has a long history of supporting incumbent worker training at the state, regional and local levels. The original Illinois WIOA Unified Plan predicted “With the elimination of the layoff aversion requirement for local incumbent worker projects, it is anticipated that there will be a marked increase in incumbent worker activities.” This expectation was realized very quickly. At the end of the WIA era, local areas had severely curtailed IWT. The low water mark for formula IWT was PY13 when only 6 LWIAs funded a total of 17 projects. The numbers have steadily increased each year. In PY16, 16 LWIAs funded a total of 79 projects (up 365%) with 77 unique business partners and over 1,700 workers completing IW training. In the first half of PY17, 18 LWIAs started 57 projects indicating the upward trend shows no sign of slowing. The state enthusiastically supports work–based training strategies including incumbent worker training projects that make both the business and employees more competitive and provide a relatively low-stress option to introduce employers to the workforce system.

2. Describe how the State will incorporate Registered Apprenticeship into its strategy and services.

The State is embedding Registered Apprenticeship on multiple levels and aligning it within career pathways as part of all workforce development efforts.

The use of Registered Apprenticeships will be encouraged through demonstration projects, policy guidance and technical assistance. With increased attention on various forms of work-based learning, we expect all types of apprenticeship (pre-apprenticeship, non-registered and registered) to become more common as the Workforce Innovation and Opportunity Act (WIOA) is implemented. Encouraging participants to simultaneously earn and learn higher technical skills through an apprenticeship will set them up to succeed in the workplace. The ultimate solution to incorporating Registered Apprenticeships into WIOA will depend on the final form of Title IB performance requirements, the planned duration of the training and the occupational demand.

The Illinois Workforce Innovation Board (IWIB) is moving toward a comprehensive, cross-program, public-private approach to fostering the use of Registered Apprenticeships. On June 16, 2016, the IWIB created an Apprenticeship Standing Committee to recommend a plan for establishing a comprehensive and integrated apprenticeship system in Illinois, oversee its implementation and performance and recommend improvements. This 32-member body represents employers, business associations, organized labor, education, community-based organizations, philanthropies, local workforce innovation areas and the four core state agency partners.

Through its planning and implementation responsibilities, this committee plays a lead role in integrating Registered Apprenticeships throughout Illinois’ workforce development system. Five areas of activity are included in the Apprenticeship Standing Committee’s charge:

1. Describe a vision of apprenticeship in Illinois, including how apprenticeships fit in the WIOA Unified State Plan and in the context of sector-based employment and training strategies;

2. Describe the state of apprenticeship in Illinois: inventory assets (supply), assess demand by sector, and identify gaps and alignment opportunities;
3. Highlight effective practices and recommend strategies for:
 - o engaging employers and industry partners;
 - o assessing the viability of industry sectors to target for apprenticeships;
 - o expanding access to under-represented populations including women, communities of color, opportunity youth, people with disabilities; and
 - o aligning apprenticeship resources and programs across all partners;
4. Identify immediate opportunities to strengthen and expand apprenticeships; and
5. Identify state apprenticeship goals and performance metrics.

The committee's planning efforts received a boost from the ApprenticeshipUSA State Accelerator Grant awarded to Illinois. The committee is advising the state on this planning grant, and has already made significant progress in designing a comprehensive state apprenticeship system that will expand and diversify Registered Apprenticeships in Illinois. Northern Illinois University's Center for Governmental Studies is staffing the Illinois Apprenticeship Committee and assisting in the delivery of the State Accelerator Grant. Their involvement will help ensure swift progress and alignment among various state apprenticeship efforts.

Other activities undertaken by the Committee since it was formed include:

- Meeting with the Regional Executive Assistant from the United States Department of Labor's (DOL) Region V Office of Apprenticeship and other Illinois Office of Apprenticeship staff to understand the requirements and process of Registered Apprenticeship;
- Researching apprenticeship models, policies and strategies of six benchmark states: Iowa, Michigan, Wisconsin, South Carolina, North Carolina and California; and
- Adopting the five core characteristics of DOL's definition of Registered Apprenticeships (business involvement; structured on-the-job training; related instruction; rewards for skill gains; and a national occupational credential) as the basis for Illinois' apprenticeship system.

Each of the public partners is committed to jointly integrating the policy and program recommendations into services. In addition to the efforts of the committee, Illinois has already begun incorporating policy and program enhancements to promote the use of Registered Apprenticeships. In April 2016, WIOA policy letter 15-WIOA-5.3, which pertains to the state's Eligible Training Provider List (ETPL) was issued. The new policy allows apprenticeship programs registered with the United States Department of Labor (DOL) to bypass certain application requirements and automatically be placed on the ETPL upon notifying a local area of its interest in providing services to Title IB participants.

The IWIB Apprenticeship Committee recognizes that apprenticeship is an effective work-based learning strategy into a career pathway. To further integrate apprenticeship and advance the use of this strategy, the Committee created three subcommittees: Business Engagement, Marketing Strategy, and Systems and Supports. These subcommittees were created to identify and implement specific activities to reach Illinois' goals of expanding and diversifying Registered Apprenticeship throughout the State. They have formed a strategic plan that identifies priorities, activities, and strategies for the IWIB Apprenticeship Committee, to ensure it is aligned with the State's strategic plan.

Led by the Illinois Department of Commerce and Economic Opportunity, Registered Apprenticeship continues to be in the forefront of activity among the State's major agencies – Illinois Board of Higher Education, Illinois Community College Board, Illinois State Board of Education, Illinois Department of Employment Security, the Illinois Department of Human Services, the Illinois Department of Juvenile Justice, and the Illinois Department of Children and Family services. Under the Governor's Cabinet on Children and Youth's

Workforce Readiness through Apprenticeship and Pathways (WRAP) project, these agencies have been convening, multiple times a month, to determine how to better align their efforts and funds into a shared vision of creating opportunity by expanding Registered Apprenticeship and creating a pipeline to Registered Apprenticeship through youth apprenticeships and pre-apprenticeships. Furthermore, recognizing that apprenticeships are a strategy to connect individuals to career pathways, these agencies are embedding apprenticeship into the career pathway language and definitions, which have been developed collaboratively and will be adopted by all.

The IWIB Apprenticeship Committee collaborated with the Governor's Cabinet on Children and Youth to engage hundreds of businesses within the state to promote the Apprenticeship Plus Framework. These businesses, along with Local Workforce Innovation Area representatives and service providers, were invited to webinars and to regional roundtables held in Southern Cook County, Springfield, and Mt. Vernon, Illinois. At both the webinars and roundtables, participants were introduced to the Apprenticeship Plus Framework, available funding opportunities, and other resources on how to start or expand Apprenticeship in their organization or region and the benefits and costs of doing so. At the regional roundtables, participants were greeted with a video of Governor Rauner asking for their commitment to fostering apprenticeship opportunities.

Similar to the business and industry roundtables, the IWIB Apprenticeship Committee again collaborated with the Governor's Cabinet and held a series of Youth Roundtables. Multiple businesses, workforce partners, youth, community colleges, and service providers were contacted across the State and invited to regional roundtables to discuss the inclusion of at risk youth and youth, in general, between the ages of 16-24, into Registered Apprenticeship and Pre-Apprenticeships. Focus groups were held at these roundtables with both youth and services providers. The Young Invincibles led the effort for the Youth Roundtables, aimed to gather feedback from young adults and supporting staff. They focused on youth apprenticeships and explored what makes youth apprenticeships exciting, what could keep the program from being successful, and how Illinois should facilitate partnerships and market these opportunities. Over 125 youth and staff attended in Mt. Vernon, Peoria, and Hillside. Between 12 and 25 youth attended each roundtable, coming from community colleges, foster care, the juvenile justice system, apprenticeship worksites, workforce development programs, and agencies (including Department of Employment Security, Department of Human Services, Department of Children and Family Services, and the Community College Board). The Young Invincibles produced a report from the research and findings, "Making Youth Apprenticeships Work for Illinois' Young Adults."

The State is utilizing the services of the Young Invincibles to provide technical assistance to both businesses and service providers who have apprentices between the ages of 16-24. The Young Invincibles are a non-profit, youth advocacy group and have conducted research around millennials and apprenticeship. In addition to their own research through focus groups and surveys in Illinois, the Young Invincibles have researched other states' practices around supporting youth in apprenticeships or reaching those who may enter Registered Apprenticeship. The Young Invincibles also created and delivered training on best practices in mentoring young adults from underserved backgrounds. Additionally, they created toolkits on recruiting and supporting young adults.

For National Apprenticeship Week, the IWIB Apprenticeship Committee, with the help of the IWP, hosted a three-hour event in Champaign, IL to engage employers and other stakeholders. Building on the interest and success of the Department of Labor's Office of Apprenticeship presentation to the IWIB Apprenticeship Committee, the event began with debunking myths of apprenticeship. The event emphasized the importance of partnerships among business, education, and workforce. Other presentations by a community college, a business, a youth advocacy group, DCEO, and ICCB described how to create or foster these partnerships for better outcomes.

On the Illinois workNet platform, the IWIB Apprenticeship committee has created a website that is the official apprenticeship-landing page for the State and will be a repository of resources for potential employers, sponsors, apprentices, etc. It highlights success stories of Registered Apprenticeship around the stats via profiles and videos.

Illinois was awarded a \$1.3 M ApprenticeshipUSA grant in PY16. This award currently funds adult apprenticeships in transportation-distribution-logistics, construction and manufacturing. The performance

period of the award was recently extended to April 2019. Experience gained through these grants will inform the mainstreaming of apprenticeships into local workforce areas.

Additional information on how the Title IB Program is encouraging Registered Apprenticeship, unregistered apprenticeship and structured internship opportunities is posted on Illinois workNet (<https://www2.illinoisworknet.com/Training/Pages/Apprenticeship.aspx>). Illinois is also encouraging the blending of apprenticeships and incumbent worker training to meet business needs by upskilling their current workforce. Several LWIAs have shown interest in this strategy by requesting situational technical assistance.

3. Provide the procedure, eligibility criteria, and information requirements for determining training provider initial and continued eligibility, including Registered Apprenticeship programs (WIOA Section 122).

On April 20, 2016, Illinois transmitted Workforce Innovation and Opportunity Act (WIOA) Policy 15-WIOA-5.3, which set procedures, criteria and information requirements for determining training provider initial and continued eligibility, including Registered Apprenticeship programs. This policy is included with this plan under Attachment U at www.illinoisworknet.com/wioastateplan. Below is a summary of the requirements of that policy.

Criteria for Initial Eligibility

Only eligible training providers and their eligible training programs will be included in the state's Eligible Training Provider List (ETPL). The initial eligibility requirements apply to all organizations providing training services to WIOA adults and dislocated workers. Providers of on-the-job training, customized training, incumbent worker training, internships, and paid or unpaid work experience opportunities, or transitional employment will not be subject to those requirements. To be eligible to receive funds for the provision of training services, the provider must be:

- an institution of higher education that provides a program that leads to a recognized post-secondary credential; this may include programs receiving approval or accreditation by the U.S. Department of Education, Illinois Board of Higher Education, Illinois Community College Board, or Illinois State Board of Education;
- an entity that carries out programs 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.) as recognized in Illinois by the U.S. Department of Labor (DOL), Office of Apprenticeship; or
- another public or private provider of a program of training services, which may include joint labor-management organizations; eligible providers of adult education and literacy activities under Title II if such activities are provided in combination with occupational skills training; or programs that have been recognized by the industry as meeting the standards necessary for approval or accreditation, when such standards exist.

All Registered Apprenticeship (RA) programs registered with DOL, Office of Apprenticeship or a recognized state apprenticeship agency are automatically eligible to be included as an eligible training provider so long as they show interest in being added to the ETPL and the following process is completed:

- Registered Apprenticeships must indicate their interest in being included on the ETPL.
- Local Workforce Innovation Areas (LWIAs) should inform the RAs in their local area via mass email, phone call or other method of these requirements.
- An RA may contact its LWIA or State of Illinois, Office of Employment and Training to indicate its interest in being included on the ETPL.
- LWIAs must notify the Illinois Department of Commerce, Office of Employment and Training in writing of all Registered Apprenticeship programs that have shown interest in being included on the ETPL.

Procedure for Initial Eligibility

Except for Registered Apprenticeships (see above), new training providers must apply for Initial Eligibility in accordance with the following guidance: Applications for Initial Eligibility of Training Providers and Training Programs. Applications for initial eligibility must be submitted according to the geographical location of the training program. A training provider is prohibited from applying for training program eligibility in LWIAs where the program site is not geographically located, unless the LWIA in which the program is located denies eligibility or fails to act on the application within 30 days of the date of application. The LWIA should instruct the training provider as to where they should apply for each training program, as follows:

- Training programs located in a single LWIA must initially apply with the LWIA where its program is geographically located.
- Training programs offered in multiple LWIAs that are identical across each of the LWIAs must initially apply to the LWIA in which the training provider has identified as its headquarters and/or primary location.
- Training programs offered in multiple LWIAs - but the program is not substantially the same across the various LWIAs - must initially apply to each LWIA in which the training program is offered.
- Training programs located out-of-state or not offered at a physical location (e.g., distance learning) must initially apply to the LWIA from which it anticipates receiving the most students. A training provider is prohibited from applying for training program eligibility in LWIAs where the program site is not geographically located, unless the LWIA in which the program is located fails to act on the application within 30 days of the date of application.

Information Requirements:

- Program Name (should match the name found in a course catalog for the training provider, if published);
- Program Description;
- 6-digit CIP code;
- O*Net code(s) that identifies the occupation of the eligible training program;
- Website link to additional program information;
- How many weeks it typically takes to complete the program;
- The total hours of instruction/classroom/lab time;
- Other than employment, the primary goal of the program (i.e., Associates Degree, Bachelor's Degree, etc.);
- If Certification, License, or Registration, the name of the certifying, licensing, or registering body;
- Identify up to three occupations for which the individual will be qualified to immediately hold after completing this program;
- The program offerings;
- The entry level requirements of the program;
- The total cost of this program;
- Types of financial aid available; and
- Year the program was established.

All job seekers and program partners will have ready access to the provider list on the Illinois workNet web portal. The information provided on the list will allow local career services staff under the LWIBs and the

Illinois Departments of Employment Security and Illinois Department of Human Services Division of Rehabilitation Services to better coordinate services and allow job seekers to make better informed decisions when selecting programs of study.

Procedure for Continuing Eligibility

The continued eligibility policy requires that all training providers (other than Registered Apprenticeships) apply at least every two years for approval, as well as for all training programs, to remain on the Eligible Training Provider List (ETPL). Eligibility is determined based on state and local performance and eligibility criteria, and any other conditions the local board considers necessary. Timelines for applying for continued eligibility as well as approval or denial are outlined within the policy.

Below are the requirements for continued eligibility and continued inclusion on the Eligible Training Provider List (ETPL) for training providers and programs previously approved for initial eligibility and those training providers and programs that were approved for transitional eligibility (as provided under WIOA Transition Policy Letter 7).

- LWIAs must ensure all training providers have their eligible training programs determined for continued eligibility on at least a biennial (at least every two years) basis to maintain their status as an eligible training program.
 - LWIAs may want to inform each training provider of any upcoming continued eligibility dates (i.e., a notice sent to the training provider 90 days prior to the continued eligibility date).
 - Continued eligibility is based on the date entered during the initial eligibility or most recent continued eligibility determination of the training program (as outlined in Section E.4. of this policy letter).
- The LWIA must receive the training provider's intent to apply for continued eligibility of a training program or programs in sufficient time to meet the following continued eligibility timeline requirements.
 - The training provider expresses intent for continued eligibility of a training program by resubmitting the Training Program Basic Information application in IWDS.
- If a training program has had only changes in information that are not significant information (as outlined in Section F.2.a.), the training provider must make such changes in IWDS and save the Training Program Basic Information record.
- If a training program has had no changes in information, the training provider must still save the Training Program Basic Information record.
- Once the Training Program Basic Information record has been saved, the Initial Criteria Status record will change to "Pending Continued Eligibility (recertification)".
- The change to "Pending Continued Eligibility (recertification)" status will prompt the LWIA that they must send the training program to the LWIB for review and determination.
 - A report will be available for the local area to identify any training programs with a "Pending Continued Eligibility" status.
- The frequency of producing these reports will be a local decision.
- The LWIA should utilize due diligence in producing this report routinely throughout the year keeping in mind training programs may be jeopardized if they are not approved for continued eligibility promptly.
- The report is titled "Training Programs Nearing Continued Eligibility (recertification) Date" in IWDS.
- The LWIA should continue to make available and enroll customers in any training program with a "Pending" status.

- The LWIA has 90 days to submit the application(s) to the LWIB for review and approval. The submission to the LWIB should include the following items:
 - A current copy of the Training Program Basic Information record from IWDS;
 - Identification of items that have changed since the initial eligibility or most recent continued eligibility determination;
 - Performance data (as outlined in Section J of this policy letter) for the training program; and
 - Any additional information the training provider has submitted for review or the LWIB determines pertinent to the review.
- The LWIB should grant continued eligibility to a training program based on the following:
 - State and local eligibility criteria are still being met;
 - State and local performance criteria have been met;
 - One or more O*Net codes associated with the training program remain on the current Demand Occupation Training List;
 - The training provider has maintained timely updates in the Illinois Workforce Development System of information on the training program; and
 - Other conditions for which the LWIB considers necessary for continued eligibility.
- The LWIB must determine eligibility of the training program within 30 days of receiving the application from the LWIA.
 - An exception to the requirement to approve subsequent eligibility of transitionally eligible providers and programs within 30 days of application is being extended through June 30, 2016. This exception will provide up to 90 days from application date for the LWIB to determine a program eligible. This is being extended to allow local boards ample time to meet and review the applications as this policy is phased in. After June 30, 2016, this exception expires. The 90-day period shall NOT extend past June 30, 2016 as these providers and programs must receive a determination no later than June 30, 2016 or they will be removed from the Eligible Training Provider List (ETPL) as their transitional eligibility period expires.
- LWIBs must notify the LWIA within five (5) business days of their decision to approve continued eligibility as a training program.
 - The LWIA must update the Training Program Basic Information record in IWDS within ten (10) business days of notification by the LWIB. The update should include the following:
 - The Status must be changed from "Pending Continued Eligibility (Recertification)" to "Accept" to indicate an accepted continued eligibility application.
 - The Program Status must be listed as "Approved".
 - The Last Elig./Cert. Date must be listed as the date the LWIB approved the continued eligibility, not the date the entry is made into IWDS.
 - The Next Elig./Cert. Date should be listed as the date for which the next continued eligibility should take place (and should take into consideration the same factors for initial eligibility as outlined in Section C.3. of this policy letter).
- Training programs that are not determined eligible by the LWIB within 30 days of receipt of the application from the LWIA will be removed from the approved program list and may reapply after one year.
- Training programs that are not determined eligible within 120 days of their continued eligibility date will be removed from the approved program list in IWDS. *(Note: The intent of this provision is to*

automatically clear training programs from IWDS when they have not been approved for continued eligibility in a timely fashion. Such programs will not be available for selection and thus are removed.)

- LWIAs shall cease to enroll customers in any training program that has been moved to the capture list. Customers who have already been enrolled in training programs that are removed from the capture list shall be allowed to complete such training programs.
- A training provider may reapply for eligibility for any training program that was not determined eligible for any reason other than "for cause" reasons.

4. Describe how the State will implement and monitor the priority for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient in accordance with the requirements of WIOA sec. 134(c)(3)(E), which applies to individualized career services and training services funding by the Adult Formula program.

All Workforce Innovation and Opportunity Act (WIOA) inquirants are asked to identify if they are on public assistance, are low income, or are basic skills deficient. Inquirants are asked to provide documentation of earning diplomas, degrees and certificates and those without post-secondary credentials and degrees are tested for math and reading skills at intake to determine eligibility for the Adult program. Individuals that become participants in the Adult and Dislocated Worker streams have information on their income, basic skills and enrollment in other social service programs such as Supplemental Nutrition Assistance Program (SNAP) recorded and tracked in the Illinois Workforce Development System (IWDS). IWDS is a web-based client tracking and reporting system that serves as the central repository of data on all WIOA participants. Tracking of participants with these indicators is done routinely at the local and state level to ensure that priority of service requirements are met.

On October 29, 2015, the Illinois Department of Commerce and Economic Opportunity (Commerce) issued WIOA Policy Letter 15-WIOA-4.2 and other related policy letters (see Attachment U at www.illinoisworknet.com/wioastateplan) that outline Commerce's WIOA Title IB general and funding stream eligibility and documentation requirements. On September 13, 2016, the policy letter was codified in Chapter 5 Section 2 of Commerce's ePolicy portal. Allowable supporting documentation is listed in the attachment to the policy letter and there are many items that can be used to support eligibility and identification for priority of service. We require the use of TABE and other tests to verify basic skills deficiency. Identifying public assistance registrants is supported by data from the Illinois Department of Human Services systems. Veteran status is documented using the DD214 form.

On Wednesday, May 17, 2017, Commerce held a webinar covering WIOA eligibility and program services that emphasized the priority of service requirement. Commerce updated its online monitoring instrument to reflect both state policy and the WIOA Final Rule. The updated monitoring instrument provides for a review of general eligibility as well as priority of service based on the new requirements. In addition, the state's monitoring instrument verifies all local areas have established written policies and procedures to ensure priority for public assistance recipients, other low-income individuals, individuals who are basic skills deficient and veterans. Commerce conducts on-site programmatic and fiscal monitoring of all local areas at least once annually. Based on IWDS data on the characteristics of participants served, Commerce has identified local areas that are not fully compliant with the Adult priority of services requirements and has addressed these deficiencies in its monitoring results letters.

5. Describe the State's criteria regarding local area transfer of funds between the adult and dislocated worker programs.

The Annual Funding Notice for the Title 1B funds provides that the local workforce areas can transfer up to fifty percent (50%) of funds between the adult and dislocated worker funding streams without approval from the state. The Department will consider requests that exceed the fifty percent (50%) transfer threshold based on the local data and overall performance.

c. Youth Program Requirements

With respect to youth workforce investment activities authorized in section 129 of WIOA,—

1. Identify the state-developed criteria to be used by local boards in awarding grants for youth workforce investment activities and describe how the local boards will take into consideration the ability of the providers to meet performance accountability measures based on primary indicators of performance for the youth program as described in section 116(b)(2)(A)(ii) of WIOA in awarding such grants. *

* Sec. 102(b)(2)(D)(i)(V)

In order to address the needs of youth in Illinois, the Illinois Workforce Innovation Board created the Disadvantaged Youth Career Pathways Task Force to create a set of recommendations for how local areas should build partnerships and engage businesses for work-based learning and other initiatives, exercising any necessary WIOA program elements in pursuit of sustainable career pathways for youth throughout the state. It is anticipated that formal policy will be developed as the state reviews the Task Force recommendations and the final WIOA regulations.

2. Describe the strategies the State will use to achieve improved outcomes for out-of-school youth as described in 129(a)(1)(B), including how it will leverage and align the core programs, and Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available.

Illinois' Unified State Plan seeks to frame recommendations for creating sustainable career pathways for youth throughout the state, with a focus on the needs of young people who are not in school and not working, a group we refer to as "Opportunity Youth." Of the estimated 1.8 million youth ages 15-24 living in Illinois in 2013, approximately 18.3% were in poverty and 19.3% were unemployed - more than twice the rate of the entire labor force. Further, of this 15-24-year-old cohort, an estimated 33.5% were not in school or working. These opportunity youth have much higher poverty (30%) and unemployment (40.2%) rates than the general population that age.

At the state level, the Core Workforce Innovation and Opportunity Act (WIOA) partners seek to leverage existing efforts such as the Governor's Cabinet on Children and Youth, which is creating a strategic vision for education and health and human services by bringing together all state entities that interact with children into a central unit, and the New Skills for Youth Initiative, a national effort funding Illinois' secondary education agency to actualize a robust plan for career pathway curriculum integration and connections to the workforce. In addition to these examples, Illinois currently has additional legislative efforts and policy initiatives that have been and will continue to be tied into the Youth Committee of the Illinois Workforce Innovation Board (IWIB), formed as a recommendation of the IWIB Disadvantaged Youth Task Force (which met from 2015-2016).

Through the IWIB Youth Committee, Illinois has leveraged the input of the business community, the Illinois P-20 Council, state boards, agencies and other partners to create a set of criteria for career pathway programs that meet the needs of Illinois youth that have barriers to employment.

Illinois has secured a funding commitment from all core WIOA partners to blend together various funding streams to support business-led sector initiatives based on career pathways that fully mainstream this youth population, while pointing the way to a sustainable integration of services across agencies and partnerships. This funding and relevant criteria, were developed into a Request for Application that identified a number of pilot projects. Technical Assistance related to the development of quality programs is being designed for deployment leading up to the release of the Request for Application (RFA).

The State has subsequently refined the RFA to incorporate lessons learned from the first application round. The program design is focused on a platform of work-based learning, the development of foundational skills, continuous improvement through education and training, and sustainability - all with the support of public-sector and business partners. Ten success elements for workforce pilot programs serving opportunity youth were identified by the task force and have been included as the pillars of the RFA, as well as key activities identified towards the accomplishment of Illinois' goals for youth activities. These elements demonstrate the

principles, strategies, and criteria in the WIOA Unified State Plan and how various funding sources may be blended for full regional ownership and sustainability.

Another project for this population is "Building Futures". Launched in 2016, "Building Futures" is a collaborative initiative between the Departments of Commerce and Children and Family Services that expands state resources to improve employment outcomes for youth transitioning from foster care. Youth and young adults in "Building Futures" have access to approved training programs and employment services through the Workforce Innovation and Opportunity Act (WIOA). The program promotes employment and training opportunities for youth in care of the Illinois Department of Children and Family Services (DCFS) through an employment and training program with a sector-based career pathway approach to job readiness, career exploration, and work-based learning.

3. Describe how the State will ensure that all 14 program elements described in WIOA section 129(c)(2) are made available and effectively implemented. *

* Sec. 102(b)(2)(D)(i)(I)

Illinois will maintain programmatic fidelity to WIOA youth policy through a system of robust monitoring, examination of best practices statewide and nationally, and continuous information sharing and technical assistance. Illinois' Disadvantaged Youth Career Pathways Task Force is the first step in this process.

4. Provide the language contained in the State policy for "requiring additional assistance to enter or complete an educational program, or to secure and hold employment" criterion for out-of-school youth specified in WIOA section 129(a)(1)(B)(iii)(VIII) and for "requiring additional assistance to complete an education program, or to secure and hold employment" criterion for in-school youth specified in WIOA section 129(a)(1)(C)(iv)(VII).

Illinois does not yet have a statewide policy. The Illinois Workforce Investment Board (IWIB) Youth Committee is examining the issue from a statewide policy perspective. The Illinois IWIB created the Disadvantaged Youth Task Force to use the vision of the Workforce Innovation and Opportunity Act (WIOA) Unified State Plan to frame recommendations for creating sustainable career pathways for youth throughout the state. The task force in turn created the IWIB Youth Committee to carry on its work. The committee is currently setting an agenda to examine policy issues affecting youth services in the wake of final WIOA regulations. The "Needs Additional Assistance" clauses in both In-School and Out-of-School youth eligibility will be reexamined by the committee for possible statewide policy solutions that are able to fit both our urban and rural dynamics, while leaving the flexibility needed for local areas to design effective local programming. This item presents an opportunity for each of the core partners to help create a cross-program policy definition that will allow their local staff to have consistent definitions. This coordinated policy could be codified through a joint issuance (the preferred method), or could be adopted as policy by each of the core partners. Regardless of the mechanism for issuance, the state partners for Title IB, Title II, Title III and Title IV are committed to improving service delivery through adoption of common policies.

5. Include the State definition, as defined in law, for not attending school and attending school as specified in WIOA Section 129(a)(1)(B)(i) and Section 129(a)(1)(C)(i). If state law does not define "not attending school" or "attending school" indicate that is the case.

Illinois State law does not define "not attending school" or "attending school". We continue to work with education entities in the state to create a working definition. For the time being we place emphasis on the term "School", which under the Illinois School Code (105 ILCS 5) is defined as "School – "The terms "common schools", "free schools" and "public schools" are used interchangeably to apply to any school operated by authority of this Act."

The Illinois School Records Act (105 ILCS 10/2) defines as: "School" means any public preschool, day care center, kindergarten, nursery, elementary or secondary educational institution, vocational school, special educational facility or any other elementary or secondary educational agency or institution and any person, agency or institution which maintains school student records from more than one school, but does not include a private or non-public school.

The Illinois State Board of Education states that “A non–public school” is any non–profit, non–home–based, and non–public elementary or secondary school that is in compliance with Title VI of the Civil Rights Act of 1964 and attendance at which satisfies the requirements” of 105 ILCS 5/26–1 of the Code.”

6. If not using the basic skills deficient definition contained in WIOA Section 3(5)(B), include the specific State definition.

With the issuance of WIOA Policy 15–WIOA–4.4 Youth Eligibility, we reference the Basic Skills Deficient definition found in the Workforce Innovation and Opportunity Act which is:

The term “‘basic skills deficient’” means, with respect to an individual— (A) who is a youth, that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or (B) who is a youth or adult, that the individual is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual’s family, or in society.

d. Single-area State Requirements

In States where there is only one local workforce investment area, the governor serves as both the State and local chief elected official. In such cases, the State must submit any information required in the local plan (WIOA section 106(d)(2)). States with a single workforce area must also include:

- 1. Any comments from the public comment period that represent disagreement with the Plan. (WIOA section 108(d)(3).)**
- 2. The entity responsible for the disbursement of grant funds, as determined by the governor, if different from that for the State. (WIOA section 108(b)(15).)**
- 3. The type and availability of WIOA Title I Youth Activities, including an identification of successful providers of such activities. (WIOA section 108(b)(9).)**

e. Waiver Requests (optional)

States wanting to request waivers as part of their Title I-B Operational Plan must include a waiver plan that includes the following information for each waiver requested:

- 1. Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan;**
- 2. Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;**
- 3. Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;**
- 4. Describes how the waiver will align with the Department’s policy priorities, such as:**
 - A. supporting employer engagement;**
 - B. connecting education and training strategies;**
 - C. supporting work-based learning;**
 - D. improving job and career results, and**
 - E. other guidance issued by the Department.**
- 5. Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment; and**
- 6. Describes the process used to:**
 - A. Monitor the progress in implementing the waiver;**
 - B. Provide notice to any local board affected by the waiver;**

C. Provide any local board affected by the waiver an opportunity to comment on the request;

D. Ensure meaningful public comment, including comment by business and organized labor, on the waiver.

E. Collect and report information about waiver outcomes in the State's WIOA Annual Report

The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver;

WAIVER REQUEST - EXPAND DEFINITION OF APPRENTICESHIP CREDENTIAL

Statutory and/or regulatory requirements to be waived

Indicate which part of the WIOA or the regulations the state would like to waive.

The State of Illinois is seeking a waiver from Section 116 of WIOA and 20 CFR 677.155, to expand the definition of the credential required to be issued specifically by Registered Apprenticeship programs during program participation or within one year after "exit".

Actions undertaken to remove state or local barriers

Describe the actions undertaken to remove state or local barriers.

There are currently no state or local statutory or regulatory barriers to implementing the requested waiver. State of Illinois regulations and policy align with current federal law.

Goals and expected programmatic outcomes of waiver

Describe and specify how the waiver will help the state achieve an identified strategic goal or set of goals that it has outlined in its State Plan. If possible and appropriate the type of waiver requested, provide quantifiable projections for programmatic outcomes that will result from the waiver.

Illinois is leveraging multiple initiatives to further integrate apprenticeship opportunities into the WIOA required and optional program partners throughout the state. The Governor has mobilized a broad cross-section of apprenticeship stakeholders to drive this important planning process. Representing a range of perspectives and resources, these individuals are serving on the Illinois Apprenticeship Committee (a standing committee of the Illinois Workforce Innovation Board (IWIB)) and oversee this planning effort and continue into implementation. This committee is encouraging demonstration projects as well as making policy and technical assistance recommendations.

A waiver, to expand the definition of the credential required to be issued by an apprenticeship program during program participation or within one year after "exit" would greatly increase the promotion and utilization of WIOA-supported apprenticeships.

Outcomes

Given the work-based learning and academic structure of apprenticeship programs, we request allowing the credential to include one or more of the following Registered Apprenticeship components completed in one year:

Attainment of college credits - not just a two-year credential or certificate, associates, or another measure that takes more than one year to earn.

- The USDOL recommended 144 hours of related training instruction.
- The USDOL recommended minimum of 2000 hours of OJT.

These components of an expanded credential definition related to Registered Apprenticeship maintain the key qualities of a Recognized Post-Secondary Credential found in Section 3(52) of WIOA including industry-recognized, portable, third-party validated/accredited, and stackable.

Approval of this waiver will provide additional flexibility and support an increase in the usage of WIOA supported apprenticeships and seeing WIOA funding as an appropriate funding source. This waiver could also positively impact the other WIOA performance indicators.

It is anticipated that expanding the definition will ease some of the apprehension of LWIBs in using apprenticeship training models

Department of Labor's policy priorities

Describe how the waiver will align with the Department's policy priorities, such as:

- *Supporting employer engagement;*
- *Connecting education and training strategies;*
- *Supporting work-based learning;*
- *Improving job and career results; and*
- *Other priorities as articulated in guidance.*

This waiver aligns with not only the Department of Labor's priorities, but also with those of the State of Illinois. Within the Illinois WIOA Unified Plan, are examples demonstrating the importance of apprenticeship programs at all levels, and how Illinois is moving toward strategies that expand both traditional and non-traditional type apprenticeship programs. As stated above, expanding the definition will increase the level of participation in apprenticeship and remove perceived barriers that may currently limit enrollment in them.

Individuals impacted by the waiver

Describe which populations the waiver will benefit, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment.

Both the education and workforce system will realize the benefits by an expanded definition of the credential required to be issued by an apprenticeship program during program participation or within one year after "exit". This will greatly increase the promotion and utilization of WIOA supported apprenticeships.

Process for monitoring progress in implementation

- *Describes the processes used to monitor the progress in implementing the waiver.*
- *Monitor the progress in implementing the waiver;*
- *Provide notice to any local board affected by the waiver;*
- *Provide any local board affected by the waiver an opportunity to comment on the request;*
- *Ensure meaningful public comment, including comment by business and organized labor, on the waiver.*
- *Collect and report information about waiver outcomes in the State's WIOA Annual Report.*

The State will use the following approach for monitoring progress in implementation:

State staff involved with the administration of apprenticeship programming will provide ongoing technical assistance and oversight as it relates to the appropriateness and the effectiveness of this waiver. This information will be submitted regularly to the IWIB Evaluation and Accountability Committee.

Annual WIOA on-site programmatic reviews will include evaluation review of the impact the waivers have on programmatic goals and outcomes.

Additionally, the IWIB Evaluation and Accountability Committee will have the responsibility of ensuring the specific goals and outcomes achieved by the waiver are realized. Furthermore, the information gathered from the waiver will inform new or changes to policy as well as provide best practices.

This strategy ensures that the goals described above, as well as those outlined in the State's Unified Plan and the IWIB Strategic Plan, are consistent with established objectives of the WIOA and federal and state regulations.

Notice to affected local boards

Address how local boards affected by the waiver were notified of the request.

Local Boards via Board members and/or Board staff as well as WIOA partners and other interested stakeholders participate in policy development. Additionally, LWIBs receive the opportunity to participate in public comment period that includes webinars.

Public Comment

Provide a description of the proactive solicitation of public comments. At a minimum, post the proposed waiver request to the state's official website for comment. Ideally, develop a targeted outreach strategy to collect input and comment from all affected stakeholders. Submit any comments or concerns collected in this manner and the outcome of the state's review of the public comments received.

In accordance with the WIOA Regulations at 20 CFR 676.135, Illinois is submitting a modification to its Unified State Plan, which is subject to the requirements outlined in the WIOA Regulations at 20 CFR 676.130(d) for public review and comment. As such, Illinois's waiver request posted on our website for comment and review by required parties and the public. USDOL will receive any comments provided.

Waiver Impact

Collect and report information about waiver outcomes in the State's WIOA Annual Report. The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver.

The IWIB Evaluation and Accountability Committee will have the responsibility of ensuring the specific goals and outcomes achieved by the waiver are realized. Furthermore, the information gathered from the waiver will inform new or changes to policy as well as provide best practices. Outcomes of the waiver will be reported in the WIOA Annual Report.

WAIVER REQUEST - ETPL REPORTING ON ALL STUDENTS

Statutory and/or regulatory requirements to be waived

Indicate which part of the WIOA or the regulations the state would like to waive.

The State of Illinois is seeking a waiver from the following Section(s):

1. Sections 116 and 122 of WIOA, and at 20 CFR 677.230 and 20 CFR 680.400 thru 680.530.

Specifically, Illinois is requesting to waive the requirements which require the collection and reporting of performance related data on all students participating in training programs listed on the state's ETPL.

Illinois' education and workforce agencies established a unified ILDS inter-agency data sharing agreement and created the Common Demographic Database Administrator (CDDA) as part of the Illinois Longitudinal Data System (ILDS) and the Workforce Data Quality Initiative (WDQI). Because of the ILDS efforts, Illinois can utilize the ILDS Master Client Index (MCI) unique identifier to leverage existing data systems and data sources to assist it with meeting the WIOA ETP performance reporting requirements. The Illinois Board of Higher Education, a member of the ILDS, is also the oversight body for private business vocational schools.

While Illinois released policy guidelines for the ETPL certification and works diligently to address streamlining reporting, the state continues to face challenges that are impeding full implementation of the ETPL requirement:

- Ensuring fairness in the process of determining training provider eligibility.
- Reducing the burden on training providers to submit performance information to the state which may not be readily accessible.
- Much of the performance information is self-reported through surveys, etc., which makes it difficult to get accurate performance data since students may not respond to surveys and, as

a result, schools may just provide performance information they previously collected without resurveying students.

- Proprietary schools do not currently have a statewide system to report student data, and as such, there is no way to automatically match students with other data sources to calculate outcomes. This results in a large reporting burden on these types of training providers.
- Providing Information on eligible training programs to WIOA participants in a way that helps them make good decisions about how to use their ITAs.

Actions undertaken to remove state or local barriers

Describe the actions undertaken to remove state or local barriers.

There are currently no state or local statutory or regulatory barriers to implementing the requested waiver. State of Illinois regulations and policy align with current federal law.

Goals and expected programmatic outcomes of waiver

Describe and specify how the waiver will help the state achieve an identified strategic goal or set of goals that it has outlined in its State Plan. If possible and appropriate the type of waiver requested, provide quantifiable projections for programmatic outcomes that will result from the waiver.

While the IWIB Evaluation and Accountability Committee may add others, at a minimum the goals and outcomes related to this waiver request include:

- Providing additional training options to enhance consumer choice and targeting training program that are in-demand
- Increasing the number of training providers to enhance competition and create economies of scale.
- Better overall performance outcomes for individuals pursuing training via ITAs.
- Stronger partnerships and relationships between training providers and the public workforce system.

Individuals impacted by the waiver

Describe which populations the waiver will benefit, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment.

Individuals who access training services or provide training services in Illinois will benefit from this waiver.

Process for monitoring progress in implementation

Describes the processes used to monitor the progress in implementing the waiver.

Annual WIOA on-site programmatic reviews will include an evaluation of the impact the waivers have on programmatic goals and outcomes.

Additionally, the IWIB Evaluation and Accountability Committee will have the responsibility of ensuring the specific goals and outcomes achieved by the waiver are realized. Furthermore, the information gathered from the waiver will inform new or changes to policy as well as provide best practices.

State staff involved with the administration of the ETPL and performance reporting will periodically examine the appropriateness and the effectiveness of this waiver. This strategy ensures that the goals described above, as well as those outlined in the State's Unified Plan, are consistent with established objectives of the WIOA and federal and state regulations.

Notice to affected local boards

Address how local boards affected by the waiver were notified of the request.

Local Boards via Board members and/or Board staff as well as WIOA partners and other interested stakeholders participate in policy development. Additionally, LWIBs receive the opportunity to participate in public comment period that includes webinars.

Public Comment

Provide a description of the proactive solicitation of public comments. At a minimum, post the proposed waiver request to the state's official website for comment. Ideally, develop a targeted outreach strategy to collect input and comment from all affected stakeholders. Submit any comments or concerns collected in this manner and the outcome of the state's review of the public comments received.

In accordance with the WIOA Regulations at 20 CFR 676.135, Illinois is submitting a modification to its Unified State Plan, which is subject to the requirements outlined in the WIOA Regulations at 20 CFR 676.130(d) for public review and comment. As such, Illinois's waiver request posted on our website for comment and review by required parties and the public.

Waiver Impact

Collect and report information about waiver outcomes in the State's WIOA Annual Report. The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver.

The IWIB Evaluation and Accountability Committee will have the responsibility of ensuring the specific goals and outcomes achieved by the waiver are realized. Furthermore, the information gathered from the waiver will inform new or changes to policy as well as provide best practices. Outcomes of the waiver will be reported in the WIOA Annual Report.

WAIVER REQUEST - OUT OF SCHOOL YOUTH EXPENDITURE RATE

Statutory and/or regulatory requirements to be waived

Indicate which part of the WIOA or the regulations the state would like to waive.

The State of Illinois is seeking a waiver from the following Section(s):

1. Section 129(a)(4)(A) and 20 CFR 681.410, which require not less than 75 percent of funds allotted to states under Section 127(b)(1)(C), reserved under Section 128(a), and available for statewide activities under subsection (b), and not less than 75 percent of funds available to local areas under subsection (c), shall be used to provide youth workforce investment activities for OSY.

Specifically, Illinois is requesting to waive the following requirements:

- a. A waiver of the requirement to expend 75 percent of funding on the OSY population. Illinois is requesting that this percentage be lowered to 50 percent.
- b. A waiver of the requirement that local funding must meet the 75 percent minimum expenditure requirement. It is requested to allow a state-level Out-of-School Youth target (See #1 above) instead of requiring individual areas to each meet the minimum expenditure requirement.
- c. A waiver of the requirement to expend 75 percent of Statewide Activities funding on the OSY population. It is requested to eliminate this percentage to allow flexibility of funding for special projects that meet the vision and mission of the State.
- d. A waiver of the limitation of only 25 percent of funding to support in-school youth.
- e. A waiver to use funding over the 25 percent limitation in WIOA to provide pre-apprenticeship programs services to this population.

Illinois' current efforts for aligning education, workforce and economic development is laying a solid foundation for promoting leading career pathway models and best practices. Career pathway development in Illinois is being expanded to encompass every level of the education system as well as across the needs of our diverse populations including those that face multiple barriers to achieving self-sufficiency.

Of importance to the Governor's vision, the IWIB Strategic Plan and the Unified State Plan is the expansion of career pathway systems into the secondary system for opportunity youth. This waiver will allow Illinois to support these visions and provide targeted strategies to the estimated 1.8 million youth ages 15-24 living in Illinois in 2013 and particularly focus on those within that number of which approximately 18.3% were in poverty and 19.3% were unemployed – more than twice the rate of the entire labor force.

Actions undertaken to remove state or local barriers

Describe the actions undertaken to remove state or local barriers.

There are currently no state or local statutory or regulatory barriers to implementing the requested waiver. State of Illinois regulations and policy align with current federal law.

Goals and expected programmatic outcomes of waiver

Describe and specify how the waiver will help the state achieve an identified strategic goal or set of goals that it has outlined in its State Plan. If possible and appropriate the type of waiver requested, provide quantifiable projections for programmatic outcomes that will result from the waiver.

In support of the expansion of career pathway systems across the education system, Illinois will use this waiver to provide youth with barriers the necessary supports to successfully equip them with the academic and technical skills necessary to improve their employability. Furthermore, Illinois anticipates that this waiver will provide greater opportunity for blending funds at the federal, state, and local levels across the partners to increase innovative strategies for improving career pathway opportunities for youth.

Potential Outcomes resulting from these goals:

1. Increase in number of youth that receive a credential (i.e. diploma or high school equivalency) and continue to receive industry recognized and/or some other post-secondary credentials.
2. Decrease in the number of youth disconnecting from the education system, particularly those transitioning out of foster care or those with a disability transitioning from high school.
3. Increase innovative strategies to address student retention, such as dual college enrollment, occupational training, or pre-apprenticeship to apprenticeship programs.

Department of Labor's policy priorities

Describe how the waiver will align with the Department's policy priorities, such as:

- *Supporting employer engagement;*
- *Connecting education and training strategies;*
- *Supporting work-based learning;*
- *Improving job and career results; and*
- *Other priorities as articulated in guidance.*

This waiver aligns with not only the Department of Labor's priorities, but also with those of the State of Illinois. Within the Illinois Unified Plan, are examples of initiatives demonstrating the importance of ensuring career and work readiness at all levels, and how Illinois is moving toward strategies that integrally tie education to workforce development. Expanding the career pathway opportunities across the education and workforce system by allowing additional funds toward in-school youth, supports our common goal to expand career pathway opportunities through more accelerated work-based training while aligning and integrating programs of study that lead to industry-recognized credentials and improved employment and earnings. This alignment will truly address the P-20 pipeline by providing necessary career readiness and occupational skills necessary to succeed in the job market.

As Illinois continues the engagement of educational institutions to create a job-driven education and training system, the state will be making significant and strategic system improvements that address workforce development needs through flexible, responsive, and progressive programs informed by labor market information. Not only will this continue to occur through the 48 comprehensive community colleges and multi-college centers, but the state will also be expanding the reach to integrate meaningful career readiness

programs and work-based learning models that focus on high demand occupations for students and workers at all levels.

Individuals impacted by the waiver

Describe which populations the waiver will benefit, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment.

Both the education and workforce system will be able to provide the benefits of this waiver to our youth with barriers. This includes at-risk youth population, educational entities, American Job Centers (AJC) and subcontracted service provider staff, employers, parents, and school counselors.

Process for monitoring progress in implementation

Describes the processes used to monitor the progress in implementing the waiver.

The State will use the following approach for monitoring progress in implementation:

State staff involved with the administration of youth programming will provide ongoing technical assistance and oversight as it relates to the appropriateness and the effectiveness of this waiver. This information will be submitted regularly to the IWIB Evaluation and Accountability Committee.

1. Annual WIOA on-site programmatic reviews will include an evaluation of the impact the waivers have on programmatic goals and outcomes.
Additionally, the IWIB Evaluation and Accountability Committee will have the responsibility of ensuring the specific goals and outcomes achieved by the waiver are realized. Furthermore, the information gathered from the waiver will inform new or changes to policy as well as provide best practices.

This strategy ensures that the goals described above, as well as those outlined in the State's Unified Plan and the IWIB Strategic Plan, are consistent with established objectives of the WIOA and federal and state regulations.

Notice to affected local boards

Address how local boards affected by the waiver were notified of the request.

Local Boards via Board members and/or Board staff as well as WIOA partners and other interested stakeholders participate in policy development. Additionally, LWIBs receive the opportunity to participate in public comment period that includes webinars.

Public Comment

Provide a description of the proactive solicitation of public comments. At a minimum, post the proposed waiver request to the state's official website for comment. Ideally, develop a targeted outreach strategy to collect input and comment from all affected stakeholders. Submit any comments or concerns collected in this manner and the outcome of the state's review of the public comments received.

In accordance with the WIOA Regulations at 20 CFR 676.135, Illinois is submitting a modification to its Unified State Plan, which is subject to the requirements outlined in the WIOA Regulations at 20 CFR 676.130(d) for public review and comment. As such, Illinois's waiver request posted on our website for comment and review by required parties and the public.

Waiver Impact

Collect and report information about waiver outcomes in the State's WIOA Annual Report. The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver.

The IWIB Evaluation and Accountability Committee will have the responsibility of ensuring the specific goals and outcomes achieved by the waiver are realized. Furthermore, the information gathered from the waiver will inform new or changes to policy as well as provide best practices. Outcomes of the waiver will be reported in the WIOA Annual Report.

WAIVER REQUEST - TIMING OF LWIA REALIGNMENT

Statutory and/or regulatory requirements to be waived

Indicate which part of the WIOA or the regulations the state would like to waive.

The State of Illinois is seeking a waiver from the following Section(s):

WIOA Sec. 106(a)(2) and 20 CFR § 679.210 (preamble)

“In accordance with WIOA Section 106(a)(2), a single local area may not be split across two planning regions. Local areas must be contiguous to be a planning region and effectively align economic and workforce development activities and resources.”

The state is coordinating a demand-driven strategic planning process across education, workforce and economic development at the state, regional and local levels. Illinois has been proactive in coordinating regional planning with the implementation of the WIOA requirements. These efforts led to the state identifying meaningful planning regions that resulted in the 10 Economic Development Regions (EDRs). To support this process, Illinois coordinated regional planning including guidelines, regional and statewide planning events as well as coordinated technical assistance resources as part of the development of the initial regional plans in 2016. With the release of the final WIOA rules, planning resources were updated in 2017.

Illinois has ten planning regions that meet the requirements of WIOA Sec. 106(a)(2) and 20 CFR § 679.210. Furthermore, all twenty-two of Illinois’ Local Workforce Innovation Areas (LWIA) met the requirements for initial designation based on analysis of fiscal integrity and WIOA performance. However, five of these LWIAs (4/Ogle, 11/Livingston, 19/DeWitt, 21/Calhoun, Jersey and 23/Douglas) split between different planning regions.

The WIOA Assessment report, issued by the US Department of Labor on June 28, 2017 requires the State, in conjunction with the local boards and elected officials, to identify a regional structure that does not result in any single local area being split between two or more regions. While a regional structure that complies with WIOA is in place; additional time is needed to complete the consultation and realignment process.

A waiver from this requirement will provide Illinois additional time for the state to implement the regional planning structure that is compliant with the requirements of WIOA Section 106(a) and 20 CFR Part 679 Subpart D. and will ensure that Illinois’ workforce system remains aligned to the employment and training systems that are tailored specifically to regional economies.

Specifically, the state is requesting until 2020 plan submission to comply with the regional planning directive. Additionally, at that time the state will issue update regional planning guidelines.

Actions undertaken to remove state or local barriers

Describe the actions undertaken to remove state or local barriers.

The Illinois Workforce Board and WIOA Core partners established a working group to develop a plan of action to address this issue. The working group meet in the summer of 2017 to review the regional planning data, identify a compliant regional planning structure, and develop a local consultation process with the Governor’s Office, WIOA state agencies, state board, state legislature, chief elected officials, local board members, and other interested stakeholders.

Illinois’ regional data has been updated and based on regional economic and labor market data that includes:

- commuting patterns;
- numbers of employers and jobs supported regionally;
- projections of regional job growth; and
- targeted industry growth patterns.

As a next step, the state will be conducting focus groups to analyze the data and garner feedback from the chief elected officials, local workforce boards, and other interested stakeholder groups which will then inform a plan for realignment.

Goals and expected programmatic outcomes of waiver

Describe and specify how the waiver will help the state achieve an identified strategic goal or set of goals that it has outlined in its State Plan. If possible and appropriate the type of waiver requested, provide quantifiable projections for programmatic outcomes that will result from the waiver.

The strategies and activities listed below are part of six policy priorities within the Illinois WIOA Unified Plan and speak specifically to regional alignment as identified in this waiver request and provide the support for planning and sector partnerships.

Strategy 1: Coordinate Demand-Driven Strategic Planning at the State and Regional Levels.

Activity 1.1: Develop Strategic Indicators, Benchmarks and Related Planning Data Resources

Activity 1.2: Establish Regional Planning Areas

Activity 1.3: Conduct Integrated Regional Planning

Strategy 2: Support Employer-Driven Regional Sector Initiatives

Activity 2.1: Promote Employer-Driven Regional Sector Partnerships

Activity 2.2: Promote Sector-Based Business Services and Employer Initiatives

Providing additional time to realign the five counties will allow the state, regional and local partners the time that is needed to consult with local elected officials and complete the programmatic and administrative realignment of the impacted LWIAs in an orderly fashion that will ultimately benefit the WIOA customers and strengthen Illinois' regional planning structure.

Department of Labor's policy priorities

Describe how the waiver will align with the Department's policy priorities, such as:

- *Supporting employer engagement;*
- *Connecting education and training strategies;*
- *Supporting work-based learning;*
- *Improving job and career results; and*
- *Other priorities as articulated in guidance.*

Illinois' current regional and local structure align with the four identified purposes of Title I of WIOA priorities involving activities at the regional level which include:

- enhancing the strategic role for states and elected officials, and Local Workforce Innovation Boards in the public workforce system by increasing flexibility to tailor services to meet employer and worker needs at State, regional, and local levels;
- supporting the alignment of the workforce investment, education, and economic development systems in support of a comprehensive, accessible, and high-quality workforce development system at the Federal, state, and local and regional levels;
- improving the quality and labor market relevance of workforce investment, education, and economic development efforts by promoting the use of industry and sector partnerships, career pathways, and regional service delivery strategies

- increasing the prosperity and economic growth of workers, employers, communities, regions, and States.

Individuals impacted by the waiver

Describe which populations the waiver will benefit, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment.

This waiver benefits the entire state workforce system, reduces unnecessary administrative expenses caused by realignment, and keeps consistent with current Economic Development Region and Local Workforce Innovation Area structures. Those specifically impacted include:

1. employers;
2. job seekers, including WIOA priority population groups;
3. local area one-stop partners and delivery systems;
4. Local Workforce Development Boards;
5. economic development entities; and
6. the Illinois Workforce Innovation Board.

Process for monitoring progress in implementation

Describes the processes used to monitor the progress in implementing the waiver.

The State will use the following approach for monitoring progress in implementation:

1. State staff involved with the administration governance provisions will provide ongoing technical assistance and oversight as it relates to the appropriateness and the effectiveness of this waiver. This information will be submitted regularly to the IWIB Evaluation and Accountability Committee.
2. Annual WIOA on-site programmatic reviews will include evaluation review of the impact the waivers have on programmatic goals and outcomes.
3. Additionally, the IWIB Evaluation and Accountability Committee will have the responsibility of ensuring the specific goals and outcomes achieved by the waiver are realized. Furthermore, the information gathered from the waiver will inform new or changes to policy as well as provide best practices.

This strategy ensures that the goals described above, as well as those outlined in the State's Unified Plan and the IWIB Strategic Plan, are consistent with established objectives of the WIOA and federal and state regulations.

Notice to affected local boards

Address how local boards affected by the waiver were notified of the request.

Local Boards via Board members and/or Board staff as well as WIOA partners and other interested stakeholders participate in policy development. Additionally, LWIBs receive the opportunity to participate in public comment period that includes webinars.

Public Comment

Provide a description of the proactive solicitation of public comments. At a minimum, post the proposed waiver request to the state's official website for comment. Ideally, develop a targeted outreach strategy to collect input and comment from all affected stakeholders. Submit any comments or concerns collected in this manner and the outcome of the state's review of the public comments received.

In accordance with the WIOA Regulations at 20 CFR 676.135, Illinois is submitting a modification to its Unified State Plan, which is subject to the requirements outlined in the WIOA Regulations at 20 CFR 676.130(d) for public review and comment. As such, Illinois's waiver request posted on our website for comment and review by required parties and the public. USDOL will receive any comments provided.

Waiver Impact

Collect and report information about waiver outcomes in the State's WIOA Annual Report. The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver.

The IWIB Evaluation and Accountability Committee will have the responsibility of ensuring the specific goals and outcomes achieved by the waiver are realized. Furthermore, the information gathered from the waiver will inform new or changes to policy as well as provide best practices. Outcomes of the waiver will be reported in the WIOA Annual Report.

Title I-B Assurances

The State Plan must include assurances that:

1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient; **Yes**
2. The state has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist; **Yes**
3. The state established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members. **Yes**
4. The state established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2). **Yes**
5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership. **No**
6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the state consults with chief elected officials in local areas throughout the state in determining the distributions. **Yes**
7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7). **Yes**
8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan. **Yes**
9. If a State Workforce Development Board, department, or agency administers state laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I. **Yes**
10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report. **Yes**
11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3); **Yes**