

ILW Apprenticeship Initiative Compliance Overview (Contractors/Grantees/Loan Recipients) Delivered on 3.25.26

Q&A

Clarifying Note:

During the contractor webinar held in March of this year, we indicated the evidence structure we use to review evidence for waivers is “**beyond a reasonable**” doubt. But that was incorrect. Instead, the standard that we utilize is the “**preponderance of the evidence**” standard when assessing all available evidence.

1. For Smartsheet, will contractors need to manually go in each quarter to submit, or will the program be automated?

Answer: We currently use Smartsheet for compliance reporting. Contractors submit forms in PDF format to state agencies, which then submit them to the Office of Illinois Works at DCEO through Smartsheet. The new Illinois Works platform, scheduled for release in 2027, will automate those processes for contractors. If you are submitting a budget supplement to a state agency, the new platform will allow you to submit it electronically. It will no longer be a PDF form.

2. Will the grantee be able to follow along the Smartsheet to verify the contractor is updating?

Answer: Once we put out the new platform in 2027, yes. There will be different types of access so the contractor can see the status of their compliance.

3. What was the goal for grantees in 2027? 40 to 45 serving how many candidates? I missed that number

Answer: The Illinois Works Pre-Apprenticeship Program has a network of 38 providers serving 1,900 participants throughout the State of Illinois. They are expected to successfully graduate 1,500 of the 1,900 participants. Those 1,500 will be added to the existing over 4,000 Illinois Works Pre-Apprenticeship Program graduates throughout the state.

4. What can contractors do with the bid credits? What is the benefit of earning these

Answer: Bid credits are used to bid on state funded capital projects. To learn more, go to: <https://dceo.illinois.gov/illinoisworks/ilworks-contractor-resources.html>

5. How does Job Matching work with CBA / signatory contractors? Union contractors can only hire through the union halls.

Answer: Some trades allow signatory contractors to sponsor individuals into their DOL-registered apprenticeship programs. The Illinois Works Career Services Team can help find qualified individuals for signatory contractors to sponsor them into apprenticeship programs.

6. Can we receive a key contact listing for each funding source? IDOT, CDB, etc....,

Answer: When you work with a state agency on a project, you receive contact information from them, or if you work with a grantee, they should provide the contact information for the agency they are working with. We do not generally work directly with those teams. Instead, we work directly with the state agency's compliance teams.

7. Contractors are required by union contract to only pull apprentices from the union hiring hall - we cannot hire off the street. How is a contractor supposed to comply with DCEO Job Order and the Union Contract? Furthermore, contractors are locked into a maximum ratio of apprentices to journeyman. As a contractor that hires the most apprentices, I cannot comply without laying off existing apprentices to hire a program graduate.

Answer: The Job Order process through the Illinois Works Career Services Teams is not a compliance requirement; it remains a free job-matching service. It is available to all contractors, but they are not required to use it. You would need to apply for a waiver when your contract requirements prevent you from complying with Illinois Works requirements.

8. If the project only requires say 8 hours every 3 months for a pipe fitter...Can an apprentice be requested for a short job like this?

Answer: If you cannot comply because of the technical requirements for the project, submit a waiver as soon as possible with evidence, and we will review your case. We have approved waivers in the past for low hours for specific trades.

9. Who is in charge at each funding source?

Answer: There are hundreds of funding sources throughout the State of Illinois. We work with the compliance teams at each of the state agencies that fund the projects. I encourage you to go to the state agencies' websites. We work with the compliance teams, not necessarily the teams responsible for putting the funding out.

10. Is there an exception to the requirements if the # of hours is low (say under 100)?

Answer: Yes. If the hours for a specific trade are 10 or under, we will automatically approve a waiver if we receive one for project.

11. A key issue I run across as a contractor is having to make room in my company for apprentices. We have no problem giving opportunities to apprentices but in most cases that means having to lay off workers who have been with the company for many years or even decades as we may only be able to perform a certain amount of work per year.

Answer: We do not want to see situations where you are laying off anybody. It is important to keep in mind that compliance for a project is not necessarily for a particular company. Instead, it is the project that must comply. The compliance falls on the project itself; it could be a combination of contractors on the project contributing to the required hours for a trade.

12. I think Mark is asking for a list of points of contact at each funding source compliance department

Answer: See response to Question # 6 above.

13. If the grant is 2 million, but is being split between 28 smaller projects, and no small project is above 500,000 how do we as a grantee handle this?

Answer: The best practice is to connect with the state agency funding the project to ensure you are following the project workflow that was provided to them. They will also let you know if the project is required to comply with Illinois Works or not.

14. Are there enough pre-apprentices to fulfill these goals? 5% seems unrealistic.

Answer: We at Illinois Works already have 4,000 graduates, on top of the 3,000 IDOT graduates. Every year there will be about 2,00 new graduates added to these numbers from the Illinois Works, Climate Works, and IDOT pre-apprenticeship programs. Career Services can connect you with Illinois Works graduates wherever you need them or let you know if they are not available.

15. For 2024 grants, do we have to go back and submit waivers, since that was not in the blanket waivers?

Answer: The Blanket Waiver (for the 5% requirement) went from July 28, 2023, to December 31, 2025. Agencies have already submitted blanket waivers to Illinois Works including your project if it fell in that time frame. You can apply for a general waiver for a particular project or trade, above and beyond the Blanket Waiver, by submitting it directly to the state agency funding your project. The State Agency, after reviewing it, will then submit it to Illinois Works.

16. What happens to a contractor on a bid that was awarded and the intention to apply and be granted a waiver if a waiver is denied? Are we then in jeopardy of the 25% fine and 3-year disbarment from bidding?

Answer: Keep in mind that if a waiver is denied by Illinois Works, the contractor can resubmit it, including new evidence or missing evidence for reconsideration. According to the law, the consequences for not complying with Illinois Works “may” be applied by the agency funding the project. DCEO does not impose any consequences; we determine whether the project complied. The state agency funding the project will then determine consequences and how they might apply them. DCEO will not tell the agencies what consequences to apply for or how to apply them; we just receive the Noncompliance Action Plan from the agency funding the project, which tells us whether they decided to apply any consequences.

17. What is the outcome of the above question from Ryan for the grantee?

Answer: See response to Question # 16.

18. Are there forms for the Contractors? It seems these forms are built for the Organization or Institution receiving the State Funds.

Answer: The contractor is to connect with the grantee, the grantee connects with the state agency, the state agency connects with the Office of Illinois Works.

The State of Illinois executes different types of projects; some are direct to a contractor. At that point these forms are being completed by whoever has the contract with the state agency. That might be the contractor itself.

19. Is there an objective list of conditions that need to be met in order to be granted a waiver request or is it all subjective? ...and what is the appeals process and who makes the ultimate determination?

Answer: The law outlines five criteria you can submit a waiver for and then you submit evidence to support your arguments. The state agency reviews and submits the waiver to Illinois Works for processing. We have 45 days to review, approve/deny a waiver. We hold waiver review meetings weekly. Recommendations are made to the Senior Program Manager who then makes a recommendation to approve or deny a waiver to the Deputy Director. The determination is made on the waiver, the state agency is notified, and the state agency informs the contractor/grantee/loan recipient. If we deny the waiver for any reason, we outline the reason(s) in the denial letter, and the contractor/grantee/loan recipient has 30 days to resubmit for reconsideration.

20. Once again, it is not that contractors are not willing to comply, but the amount of paperwork is extremely extensive and burdensome on the contracting companies. Is there anything in the works to condense the amount of paperwork required on these types of projects? A lot of these companies are small family businesses who will need to hire more employees just to keep up with the paperwork. It was mentioned that to apply for a waiver, a final budget or cost of project needs to be submitted prior to the end of the project. On most public projects this is hard to do as contractors are paid by measurements taken in the field and multiplied by unit

prices. These final numbers are not known until the project is over. How do we address that hurdle?

Answer: We understand and recognize there is definitely a burden, and this is why we are devoting quite a bit of resources to developing new technology to streamline the process. This new technology should be operational by the end of the year, early next year. We need to know the Budget Supplement info before we can approve a waiver because we must know what it is we are waiving—we do not have visibility of the trades on a project without the Budget Supplement. A waiver submitted without a Budget Supplement is considered incomplete and will be denied.

21. The July 2025 review of the program by NIU presented to Illinois Works Review Panel documented 400 into apprenticeship programs does DCEO know where they are and if they are available?

Answer: Yes. Through our Career Services Team who are charged with tracking our graduates—where they are, and if they are available to work and enter DOL-registered apprenticeship programs.

22. Will you be sending a copy of this PowerPoint to us or will it be available on the website?

Answer: Yes. It will be available on our website under our Partner Guide.

23. What do we do when the union refuses to provide documentation? 150 Operators historically refuse to put anything down on paper. We request apprentices all time and they say none are available but will not provide documentation. How should we deal with that?

Answer: Please do send a request to intervene and let us know. We have spoken to different parties to make sure they understand the requirements in the past. We do receive documentation from unions all the time. Do send these instances our way, and I would be more than happy to make a call to a particular union or business manager.

24. While it's not contractor specific- the requirement- as I understand it - it is trades specific. If there are multiple contractors one cannot "make up" the hours for another because they are different trades. What am I not understanding?

Answer: When possible, if multiple contractors are doing the same trade work, they can pool hours to meet the 10% and 5% goals for a particular trade. This may not be possible with all projects, but we have certainly seen it done with some of the projects.

25. Also is the 100-hour requirement written down anywhere?

Answer: It is not clear what the 100-hour requirement question relates to.

26. Is there a handbook with all the information? Instead of looking at different links?

Answer: The Office of Illinois Works is in the process of producing a handbook for contractors/loan recipients/grantees. Once published later this year, it will be made available on our Partner Guide.