

Compilation of Public Comments: Illinois 2020 Unified State Plan Public Forum events

The following list was compiled from stakeholder input received during the 30-day public comment period for the 2020 Unified State Plan. Comments were received via e-mail and during three public awareness forums held across the state (Chicago, Springfield and Ina) in January 2020. In an effort to reach those unable to attend a public forum, a statewide virtual forum was held for all interested stakeholders.

Attendees were briefed on how WIOA is implemented in Illinois, the layout of the plan and the six essential State strategies for the workforce system described in the plan. In addition, the Illinois Community College Board convened three webinars to solicit feedback from Adult Education and Career and Technical Education providers across the state. Comments are grouped together based on the State strategy to which each one most closely aligns. Note that many comments did not address the plan, but rather voiced support of very specific operational strategies. Please note that, per the instructions given for the submission of public comment, only comments submitted via the three below methods were considered for inclusion in the summary:

- Submitted via the WIOA e-mail inbox: CWD-wioaplan@ad.siu.edu
- Submitted via written comment at a public forum
- Submitted verbally at a public forum accompanied by a written comment

The State of Illinois received comments from a variety of WIOA service providers, advocacy groups and nonprofits from across the state providing support and suggestions for the workforce system State strategies included in this Unified State Plan and other WIOA activities. Comments cover a wide range of workforce-related themes relevant to this State Plan, including:

- Data-sharing and systems integration among core and required partners at both the State and local levels
- Addressing the needs of populations with multiple barriers to employment, including improving service delivery and program outcomes for racial minority groups, English language learners and individuals with disabilities
- Reducing barriers for the hiring and retention of instructors and training staff, especially for those instructing English language learners and other populations with multiple barriers to employment
- Providing career pathways for economic advancement, utilizing evidence-based approaches and innovative teaching strategies in OJT opportunities and apprenticeships
- Ensuring the State understands the need for business- and job seeker-driven service strategies
- Support for the State's waiver request to amend the definition of "incumbent worker" by either reducing or, preferably, eliminating the 6-month employment requirement, as well as rationale for this support

Formal public comments focusing on these themes and more are included in the compilation below.

See Operational Elements – Item 2(A): Implementation of State Strategy, Core Program Activities to Implement the State’s Strategy to refer to the State Strategies and activities included in the 2020 Unified State Plan.

Strategy 2 – Support Employer-Driven Regional Sector Initiatives

1. **Illinois Council on Development Disabilities** - The Plan is heavily focused on aligning with regional business workforce need. That’s a great strategy, but Illinois needs to also focus on assisting all who desire work, including those who are not a good fit for career paths identified as workforce need areas. Entry level and non-skilled jobs are necessary, too, and can be filled readily by workers who aren’t candidates for skilled work.
2. **Illinois Council on Development Disabilities** - Businesses (human resources, managers) benefit by learning how to better accommodate and recruit (ex. hiring practice doesn’t include people), then train and supervise non-traditional workers. People tend to shy away from the unfamiliar, and professional development in best practices for including workers who come with any kind of special need broadens the talent pool. Although ICDD has a focus on hiring people with developmental disabilities, our past work found that jointly working with others such as immigrants, people with mental health issues, ex-convicts, and others benefits all special populations in joining the workforce. Changes to business practice is much the same for everyone and mostly involves an openness to look at individuals and what strengths and skills they bring and to clear away barriers to bringing them into the workforce and supporting and accommodating as needed so they can succeed.

Strategy 3 – Provide Economic Advancement for all Populations through Career Pathways

3. **Anonymous** - The State needs a plan to allow for shared outcomes and metric attainment between CBOs/smaller Title II providers and Title II partners that conduct other Integrated Education and Training. This will increase referrals and the ability for the CBO to continue to provide wrap around services.
4. **Anonymous** - Are we going to reconsider how we are funded based on WIOA outcomes? It costs much more money to run an IET and we are being held to different standards without additional funding to support.
5. **Anonymous** - There is a need for a comprehensive assessment tool to capture realistic barriers, employment interest and issues for accurate placement for services.
6. **Illinois Council on Developmental Disabilities** - Business (HR, Managers) benefits by learning how to better accommodate and recruit (e.g. hiring practice doesn’t exclude people), then train and supervise non-traditional workers. My group focused on ESL, MI and DD populations. This benefits any special population.
7. **Illinois Council on Developmental Disabilities** - Implementation strategies of DRS or other community providers should use proven best practices such as IPS, supported and customized employment, Project SEARCH and others. This opens the barrier that counselors, job coaches, trainers and job developers need professional development and pay that attract people with knowledge and skill. [Pay] rates are sorely insufficient today.

8. **Illinois Council on Development Disabilities** - Activities 3.2 and 3.4 - To best include and train the broadest potential workforce, all training should use Universal Design teaching strategies. That is a proven means to effectively train learners with all types of learning styles, so it benefits everyone, including but not limited to people with developmental disabilities.
9. **Dr. Milka Ramirez, City Colleges of Chicago** - I would like to see a promotion and investment in City Colleges of Chicago to expand and support employer-led partnerships. It is important to address language access for Limited English Learners.
10. **Anonymous** - The Chicago Citywide Literacy Coalition established a Career Pathways Navigator at the Near West American Job Center to collaborate with IDHS, IDHS, CHA, WIOA Title I and II partners in transitioning their clients into an appropriate Adult Education program or career pathway. In the past 18 months, the career navigator has established relationships with all WIOA core partners and has assisted adults on state assistance with transitioning into an adult education program (we need professional development for WIOA partners).
11. **Dr. Milka Ramirez, City Colleges of Chicago** - Consider a trauma informed lens that frames[?] systemic oppression to address barriers and increased attraction to equity initiatives.
12. **Greater West Town Training Partnership (GWTP)** - Provide economic advancement for all populations through career pathways.
 - a. Focus on trauma informed care – address systemic oppression.
 - b. Apprenticeships deal with issues of equity and under-represented populations.
13. **Dr. Milka Ramirez, City Colleges of Chicago** - Increased and sustained attention to underrepresented populations (i.e. ???, LatinX, African American, Veterans, adult ed., foster care youth, and so on).

Strategy 4 – Expand Service Integration

14. **Anonymous** - The biggest barrier during the process of integrating WIOA partners was educating partners about the different Adult Education programs.
15. **Dr. Milka Ramirez, City Colleges of Chicago** - A web-based tool has built-in barriers due to digital literacy; may need more training and project development; add person-to-person pre-employment skills!
16. **GWTP** - Provide coordinated and enhanced career services.
 - a. Web based tool (IL Career Information System)
 - i. Limited and not user-friendly to participants
 - b. Digital Literacy
 - i. Lack digital literacy to use web-based tool
 - ii. Pre-employment skills
 1. Person-to-person to learn digital literacy
17. **GWTP** - Expand professional development offerings
 - a. Add a course “New to WIOA” to help individuals that may not be as familiar with the contract

- b. Partners work closer with CBO and nonprofits to help with homelessness, food shelters and mental illness. It needs to be a better collaboration. We need a reliable database to access resources.
18. **Illinois Council on Development Disabilities** - Activity 4.1 (and Activity 5.2) – One-stop career centers offer a wealth of training and resources for job seekers and staff have had training under past initiatives in working with people with disabilities. Over time and through attrition, job seekers continue to experience barriers. For example, some job seekers are not computer literate, some have overall literacy issues, some are not English speaking, some are blind or unable to manipulate a mouse., so just being directed to computers to use resources is not sufficient.
- Activity 4.3 - Continuous staff development is important at 1-stops, in DRD, and at CRPs. I-stop staff can ensure that job seekers are matched to information and tools that truly allow them to access and benefit from resources or get the support they need to do so. Rehabilitation counselors, job coaches, job developers and other service professionals are most effective when trained in researched best practices. To build the rehabilitation workforce itself, Illinois must face the barrier that counselors, job coaches, trainers, job developers receive pay that attracts and keeps people with knowledge and skill. Rates are sorely insufficient today to cover adequate pay for professional, trained staff.
- Activity 4.4 – For successful employment of all, other entities must partner in the activity of this Plan beyond the core partners, including high schools and transition staff, CRPs, and Dept. of Human Service Divisions of Developmental Disabilities and Mental Health.
- Activity 4.4 – Include the utilization of Community Work Incentive Coordinators who promote and guide potential job seekers on the many SSA work incentives available for those who may see employment as a barrier to retaining benefits. This expands the vision of possibility.
- Activity 4.4 - The Div. of Developmental Disabilities has a person-centered planning program through PUNS – the Prioritization of Urgency of Needs list. This is a useful database to know how many people with developmental disabilities are interested in work, but currently unserved. Schools are now mandated to educate teachers and families on the need to sign up for the PUNS process.
- Activity 4.4 – Strategies to employment should include proven best practices such as IPS – Individual Placement and Support, supported and customized employment, and Project SEARCH. There are some DRS counselors and CRPs trained in these models, but their use must expand to meet the demand. Self-employment and microboards are other non-traditional strategies to employment.

Strategy 5 - Promote Improved Data-Driven Decision-Making

19. **Pyramid Partnership, Inc.** - How do we serve individuals who do not meet all the WIOA requirements (e.g. Youth-Parents make too much money, but not enough to support the educational/vocational needs of their child)? What is in place to serve them?

State Response: *Job seekers can still use the doorway of the WIOA system for basic career exploration. There is a wealth of information available at American Job Centers*

for job seekers to access that is not behind eligibility barriers. The one-stop system in Illinois views itself as a great resource for all seeking gainful employment and promotes apprenticeships, incumbent worker training, use of labor market matching and referrals to non-WIOA programs. The one-stop system also focuses heavily on the integration of career services and promotes program awareness among core and required partners – a focus which encourages high levels of job seeker support from many WIOA programs.

20. **Illinois Council on Developmental Disabilities** - State agencies need to be able to share data and track longitudinally to track impact. For special populations like developmental disabilities, mental health, etc. it would be great to track from school (ISBE too!) into adulthood. Cross data would show what supports and resources are needed and whether they were effective. This, if used for continual analysis, would move us to strategies that are most effective. It also allows for documenting that even for people who may need some support long term, assisting them to be as independent as possible and working at the level best for them does result in cost savings over time from what they otherwise would require.

Strategy 6 - Advance Public-Private Data Infrastructure

21. **Illinois Council on Development Disabilities** - There are databases in construction including ProPath and the Longitudinal Data System. These should be completed and integrated and expanded to link with even more databases. And soon! The promise of better tracking and data has long tantalized but failed to be a reality as a resource within the employment field.

Activity 6.2 - State agencies need to be able to share data and track longitudinally to track impact. For special populations like developmental disabilities, mental health, etc. Identification of potential workers should begin with data from schools via the State Board of Education (ISBE) and follow youth into adulthood. Cross data analysis would show what supports and resources are needed and whether they were effective. Used for continual analysis, longitudinal data would move us to strategies that produce and sustain the best long-term outcomes. There is research showing that employment allows people with developmental disabilities (and other disabilities) to become more independent in all life areas, not to mention happier and more connected to their local communities. Having documentation of earning and outcomes, even for people who may need some support long term, demonstrates that provision of supports which allow work results in cost savings over time from the support that a person otherwise would require over a lifetime. This is important information to share for budget forecasting and appropriating purposes.

Adult Education public comments received

22. **Christine Strohl, Lakeland College** - I really think a universal referral system, that is supported by the state, would help with enrollment in all partner programs. LWA 23 continues to work toward a referral process however we are very spread out and not in one location, which makes it very difficult to make referrals, and even more difficult for follow up. Often once we have the referral the student/client/participants become frustrated with the same paperwork and questions from each agency. If we could make this process more

seamless, with directive from the state, enrollment, retention and completion would increase for adult education students and all partner programs.

23. **Christine Strohl, Lakeland College** - I really like the adult education hotline, chat and texting feature to increase awareness and enrollment. We need new marketing ideas and I think this would be helpful. If we could have other programs share their marketing ideas to spur new and innovative practices. Also, if there was regional marketing that included multiple programs sharing the cost.
24. **Christine Strohl, Lakeland College** - I struggle with open enrollment. We switched over to managed enrollment about 4 years ago (or at least that is what I can figure from prior years notes) I would like to hear how programs are doing open enrollment and still providing direct instruction without interruption.
25. **Christine Strohl, Lakeland College** - Would like more information on open enrollment be managed enrollment.
26. **Christine Strohl, Lakeland College** - How about a state supported referral system for all wioa partners?
27. **Kim Marisa, Prairie State College** - Perhaps we need to change our marketing efforts at the local, regional and state levels.
28. **Kim Marisa, Prairie State College** - Particularly for new programs, it would help to have a model for which to follow from an experienced program., Now that I'm immersed in building new career pathways for ICAPS courses, there are so many pieces to the puzzle.
29. **Andrea Fiebig, Harper College** - One of the challenges to using the EL/IET funding is that many second language learners who are ready for IET's are topping off on all the ESL tests. Could we start to use TABE?
30. **Andrea Fiebig, Harper College** - Innovation is challenging to many of our institutions and we need your support. The idea of a complete rebrand of Adult Education is the only way.
31. **Bevan Gibson, SIUE** - If we are providing services to low literacy levels, we could focus on Basic Careers in a pre-bridge and then work to see where they go from there.
32. **Bevan Gibson, SIUE** - What does it take to get an adult education program's ICAPS program on the approved training provider list for Title I? that would be helpful to our existing and future ICAPS programs.
33. **Bevan Gibson, SIUE** - What about the possibility of partnering to share students to get them from point A to Point B? Would this require a change in funding policy?

34. **Anonymous** - New Administrators may benefit from program mentoring and there were discussion and would like guidance on open-enrollment versus managed enrollment.
35. **Anonymous** - Additionally, programs would like guidance on sharing students and what that could look like as it relates to state and federal reporting, MSGs, and credential attainment.
36. **Anonymous** - Additionally, many programs are seeking guidance on qualifying scores for IET/IELCE on initial assessment.
37. **Anonymous** - Programs would like to see statewide leadership in marketing and rebranding adult education from Get your GED to Begin your Education and Find Your Career.
38. **Anonymous** - There is a need for the development of a career plan, or schematic, that helps students move along their pathway with multiple entry and exit points.

Other public comments received

39. **Illinois Council on Developmental Disabilities** – [The Illinois Council on Developmental Disabilities welcomes the opportunity to comment on the 2020 WIOA State Unified Plan.] Employment is consistently at the top of the list when people with developmental disabilities are asked what is most important to them, yet their competitive employment rate remains far below nearly every group, including those with various disabilities. People with developmental disabilities are proven to be reliable, dedicated workers who contribute toward their employer’s needs. Past methods of prevocational training and sheltered work failed to move people into actual competitive employment. The more successful models train people in real work settings. In Chicago, a recent ordinance will move all employees into minimum wage work and phase out all remaining sheltered work programs. The Council on Developmental Disabilities is focused on how our resources can assist Chicago community rehabilitation providers (CRPs) to shift their service models and move people with developmental disabilities into the general workforce where they want to be.

All Plan strategies used in implementation should be accessible to all job seekers. Employment First is described on page 9 of the Plan under the Department of Human Services. It is Illinois law that employment be the first option for service for ALL state agencies. This philosophy must be embraced by the four core agencies and reflected in their commitments and implementation activities.

Other comments received from the Council related to the Plan’s State Strategies are included under the respective strategy section of this public comment summary.

40. **Anonymous** - There is a need to strengthen the marketing strategies for the WIOA services provided across agencies and partners.

41. **McHenry County Workforce Network Board** - The McHenry County Workforce Network Board supports the WAIVER related to Incumbent Worker Training. This will allow Local Workforce Innovation Areas to better serve the business community helping employers to upskill newly hired, promising employees without having to deny or delay needed training.
42. **Peter Hall, McHenry County Workforce Network** - I agree with the Incumbent Worker Training Waiver.
43. **Illinois Workforce Partnership** - The Illinois Workforce Partnership (IWP) is in support of the Incumbent Worker Training Waiver.
44. **Local Workforce Innovation Area 14** - LWA 14 would support the waiver to eliminate the length of employment requirement in the incumbent worker program for the following reasons:

It is a pro-active approach to training as opposed to re-active. Train now and not after layoff. In the current economy, with an unemployment rate of less than 4%, companies are hiring candidates who do not have the skills needed for their positions. Incumbent Worker training reduces the chance of these new hires being laid off when there is a change in the economy.

If the length of employment requirement is just reduced, then the minimum amount of time should not be greater than 3 months. Most companies have a 90-day probationary period. If individuals retain employment, then companies have made a commitment to employment thus reducing the chances that the individual will be laid off after training is completed. If an individual is laid-off they will have marketable skills.

The Apprenticeship program should be exempt from any minimum length of employment requirement. Employers willing to use the apprenticeship program have made a commitment to long-term employment.

Please see below to view three additional formal public comments, including comment from:

- *David Wu, Executive Director of the Pui Tak Center in Chicago, IL,*
- *The Little Village Education Collaborative Adult Education Committee, and*
- *Equip for Equality*
 - o *Language changes suggested by Equip for Equality in public comments #2, #7 and #9 were made in the development of the 2020 Unified State Plan are reflected as such.*



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**Illinois WIOA Unified State Plan
Public Comment from David Wu, Executive Director, Pui Tak Center on 1/15/2020**

Thank you for the opportunity to provide feedback on Illinois' WIOA Unified State Plan.

My comments related to the draft is shaped by being the Executive Director of the Pui Tak Center, a long-time provider of adult education through Illinois Community College Board funding and being a member of the Asian American Family Commission, a newly established state commission that has yet to convene.

According to the Census Bureau's Illinois profile based on 2018 American Community Survey data, immigrants are 14.0% of our state's population and Asian Americans are 5.2%. I was curious about other minority groups and found that Hispanic or Latinos are 17.0% and African Americans are 14.2% of our state's population.

While I understand that the Unified State Plan is necessarily high level, I wondered what I could learn through a word search of the plan.

- The word "immigrant" is referenced 7 times in the narrative about ICCB's Adult Education program and 4 times related to agricultural workforce.
- The word "Asian" is referenced 1 time about unemployment rates.
- The word "Hispanic" and "Latino" is referenced 2 times about unemployment rates and farmworkers.
- The word "African American" is referenced 1 time about unemployment rates.

Immigrants, Asian Americans, Latinx and African Americans are sub-populations that need workforce services. In addition, many of our state's small businesses are owned by members of these communities. The plan would benefit from more careful consideration of the needs and the opportunities that these communities offer to the state.

I was pleasantly surprised that there was an entire section titled "Addressing the Accessibility of the One-Stop Delivery System for English Language Learners" (10 paragraphs from pages 234-236 - a noteworthy improvement compared to 1 paragraph in the prior plan). This section describes the Department of Commerce's Equal Opportunity Monitoring and Compliance role in ensuring that services are accessible to limited English speakers. This includes making sure that documents are translated, interpretation services are available and that language preference is noted on client records. In the future, the workforce system can be made more effective by going beyond providing language assistance to those (likely very few) seeking services to also outreaching into immigrant and other minority communities. The workforce system should partner with ethnic community organizations that can inform strategies and approaches on how to best reach and serve their respective communities.

Thank you.



Jennifer Foster
 Deputy Executive Director
 Illinois Community College Board
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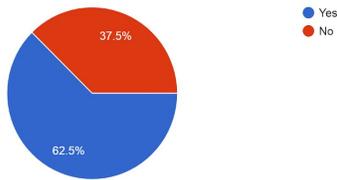
Dear Ms. Foster,

The Little Village Education Collaborative strongly encourages the Illinois Community College Board facilitate and engage in productive dialogue regarding the current requirements for English as a Second Language instructors.

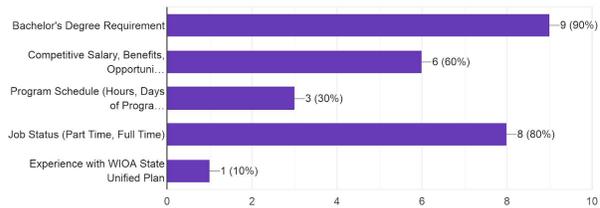
Currently, the Illinois Community College Board requires ESL instructors to have a BA or BS degree in education or a related field as a minimum qualification. Together, we affirm the need for alternative pathways to learning for our instructors and students, including native language learners. This minimum requirement disqualifies potential instructors, restricts job opportunities, and places an unnecessary hiring burden on community based organizations.

We have collected data from 16 Adult Education providers, which include Little Village community based organizations and Area Planning Council core member organizations. Data collected indicates the bachelor’s degree requirement is *the* greatest barrier to hiring qualified ESL instructors.

Has your organization experienced difficulties in hiring Adult Education ESL instructors?
 16 responses



If you selected yes to the previous question please check all that apply.
 10 responses



Data collected illustrates a strong urgency to align local community needs to Illinois state goals. This information is compelling in large part because of its impact on the missed opportunity to instruct students. According to data collected by the SIUE Index of Need Project there are 909,544 individuals living in households whose primary language is not English; 66.59% of those individuals’ primary language is Spanish. An Adult Education provider survey participant shared the following: “ In our organization we have mentored and worked with extremely passionate and talented individuals (some of whom were our former students) who are not eligible for hire due to the B.A. requirement. We would love to see the Professional Pathway available to these committed teachers as they also work on their B.A.”

We believe it is time to create alternative solutions to this requirement. Please join us in developing and piloting strategies that will help us to improve teacher quality, availability and retention, in addition to aligning community needs to state goals. We look forward to the opportunity to innovate and create meaningful and impactful strategies to support Adult Education pathways with you.

Sincerely,
 The Little Village Education Collaborative Adult Education Committee





The Little Village Education Collaborative (LVEC) was initiated after the release of the Little Village Quality of Life Plan in 2013 and is charged with the implementation of education-related strategies developed in that plan. The Little Village Education Collaborative members represent over 40 organizations and institutions (including schools) providing educational services in Little Village. Working groups of LVEC include early childhood, elementary and middle school, high school and post-secondary, and adult education working groups.

Our Vision

“As we plan our future in Little Village, we value our family, culture and community. Our vision is a community that is educated, peaceful, united, clean and prosperous.” (LV Quality of Life Plan)

Our Mission

The mission of the Little Village Education Collaborative (LVEC) is to connect the key players impacting the education system in this community in order to pool their time, talent and expertise. The group works to evaluate the current state of this system, plan strategic improvements for the future, and support legislative changes that expand educational access and opportunity. Its ultimate goal is to enhance educational outcomes in Little Village from birth to old age.

Our Core Values

ORGANIZED: LVEC is intentionally structured to empower its members and move its mission forward. Its subcommittees – which focus on early childhood education, elementary and middle school, high school to post-secondary readiness, and adult education– implement and revise strategies that are outlined in the 2013 Little Village Quality of Life Plan. All members convene quarterly in order to align the work of subcommittees and reinforce broader goals.

INNOVATIVE: LVEC convenes a diverse range of stakeholders and promotes unique methods of collaboration. This encourages the development of innovative and comprehensive ways to address educational issues in Little Village.

PARTICIPATORY: LVEC seeks to be inclusive of all stakeholders. It uses a participatory approach that embodies respect, trust, transparency, “human goodness” and social justice.

Little Village Education Collaborative Framework

In order to strengthen the collaboration that is taking place within subcommittees, LVEC members have engaged in multisector conversations guided by the Little Village Quality of Life plan. These dialogues have helped to bridge silos between public and private educational institutions; parents, students and community leaders; and non-profit organizations by harnessing the skills and contributions of each sector and acknowledging established systems of power. LVEC has created safe spaces that recognize the unique experiences and priorities of each partner. This helps to achieve a deeper level of understanding and commitment, which leads to greater collective impact.

LVEC creates a space for providers, school administrators, parents, and other stakeholders to advocate, inform, and innovate together in order to improve educational outcomes for the residents of Little Village and surrounding areas.



Little Village Education Collaborative is convened by Enlace Chicago with the generous support of the McCormick Foundation Fund.



Summary:

During the January Little Village Education Collaborative (LVEC) Adult Education Committee meeting partners discussed the difficulties in hiring and retaining ESL instructors. A common concern was shared amongst participating partners: the minimum degree requirement is *the* greatest barrier to hiring qualified potential instructors; and a collaborative decision was made to collect data to identify needs beyond our committee. A simple survey was created; and was distributed to members of our committee and to the Area Planning Council 508 core members. Respondents were given 10 days to complete the survey. Data was analyzed so that it could be included in our letter for open public commenting for the WIOA Unified State Plan.

LVEC Adult Education partners affirm the need for alternative pathways to learning for our instructors and students, including native language learners. Alternative pathways create an opportunity to support the Adult Education Pipeline within the Little Village Quality of Life Plan. They also afford community based Adult Education providers the potential to increase community instructors, and the ambition to provide professional development within the Little Village community.

The following is an analysis of data collected from responses to our Adult Education Survey: ESL Instructors.

Has your organization experienced difficulties in hiring Adult Education ESL instructors?
16 responses

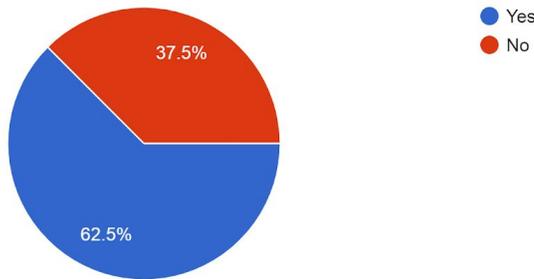


Figure 1. Of the 16 responses provided, ten Adult Education providers indicated their organization experienced difficulties in hiring ESL instructors.

If you selected yes to the previous question please check all that apply.
10 responses

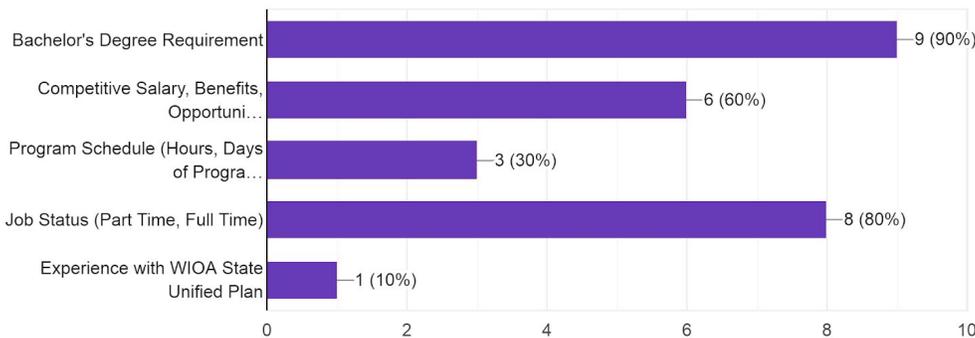


Chart 1. 62.5% of Adult Education providers experienced difficulties in hiring ESL instructors. Those Adult Education providers identified the bachelor's degree requirement as *the* greatest barrier to hiring ESL instructors.

Based on difficulty of hiring ESL Instructors did your organization experience any missed opportunities to instruct students?

10 responses

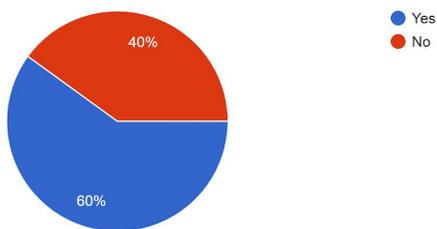


Figure 2. From the Adult Education providers who experienced difficulties in hiring qualified ESL instructors, 60% of respondents identified having missed opportunities to instruct students.

If so, how many students?

6 responses

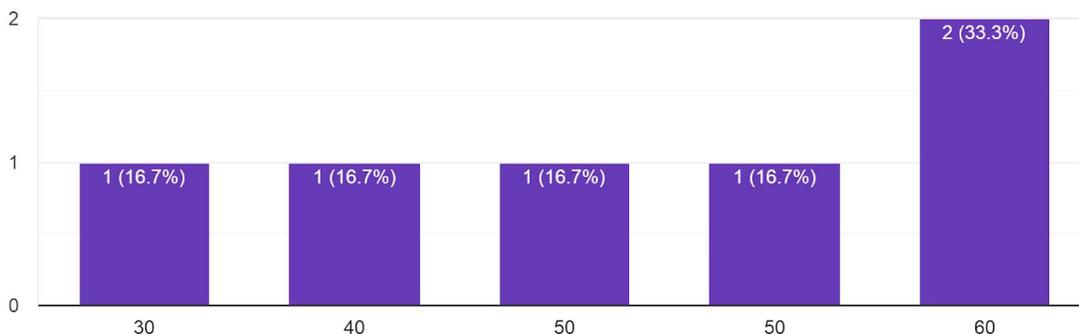


Chart 2. 60% of Adult Education providers identified having missed opportunities to instruct more than 200 potential students combined as a result of hardships in hiring ESL instructors.

How many otherwise qualified candidates was your organization NOT able to hire due to the minimum instructor education requirement?

6 responses

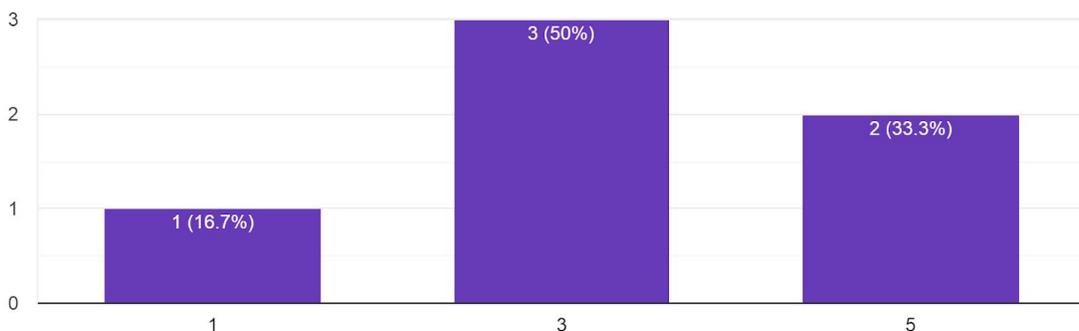


Chart 3. Adult Education providers were unable to hire 20 potential ESL instructors due to the minimum education requirements.

Has your organization experienced any missed opportunities to instruct students because of low native language literacy?
15 responses

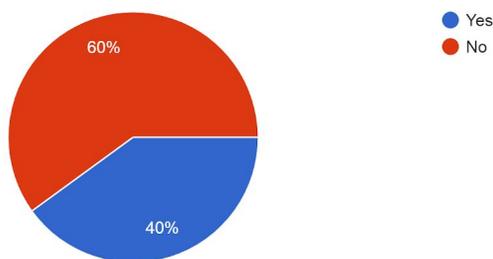


Figure 3. Of the respondents, 6 Adult Education providers indicated missed opportunities to instruct students due to low native language literacy. This data indicates an increased need in our community to provide native language instruction as the foundation to successful completion of ESL courses. Adult Education providers have found some students disengage and eventually disenroll from ESL classes as a result of an inadequate foundation of their native language.

If so, how many students?
6 responses

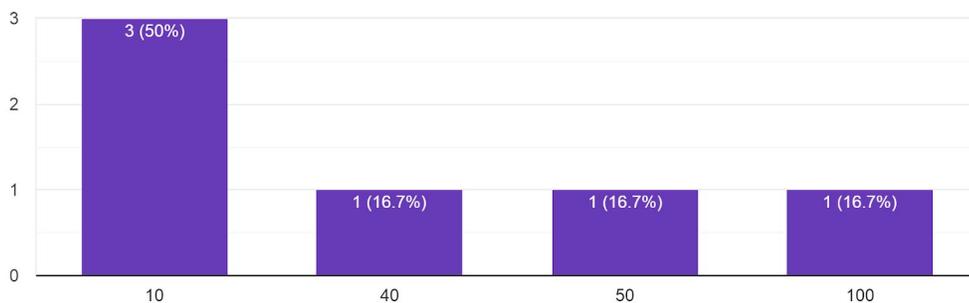


Chart 4. Adult Education providers indicated a missed opportunity to provide native language literacy courses as a foundation to ESL to over 200 students.

Please share any comments or questions. (Contact information has been redacted to protect respondents’ privacy.)

- 1.) “Thank you for highlighting the minimum instructor issue. In our organization we have mentored and worked with extremely passionate and talented individuals (some of whom were our former students) who are not eligible for hire due to the B.A. requirement. We would love to see the Professional Pathway available to these committed teachers as they also work on their B.A.”
- 2.) “I have concerns as the movement in Adult Education is to create one size fits all approaches for all programs. All programs are different with differing resources and student bodies. I would like to discuss minimum teaching requirements because it seems that there are many voices being left out to our detriment.”

This data is exceptionally compelling in large part because of its impact on the missed opportunity to instruct students. According to data collected by the SIUE Index of Need Project there are 909,544 individuals living in households whose primary language is not English; 66.59% of those individuals’ primary language is Spanish.



Equip for Equality (EFE) is pleased to submit comments on the 2020 WIOA Unified State Plan. By way of background, EFE is an independent, not-for-profit organization designated by the Governor in 1985 to administer the federally mandated Protection and Advocacy system for people with disabilities in Illinois. Historically, the employment of people with disabilities has been a major focus of our organization. EFE has an Employment Rights Helpline that provides people with disabilities with self-advocacy assistance, legal advice and representation on issues related to discrimination in employment. Additionally, after passage of the Illinois Employment First Law, Equip for Equality released its *Employment First Blueprint*, which contained action steps that Illinois could take to make competitive, integrated employment a reality for people with disabilities. (For more information on the *Blueprint*, go to: <https://www.equipforequality.org/issues/employmentfirst/>) EFE has also been active on the Governor’s Task Force on the Employment and Equal Opportunity for People with Disabilities (EEOPD), and has co-chaired the Workforce Development Work Group. One of the major recommendations of the Work Group is to ensure that WIOA implementation in Illinois is consistent with the Illinois Employment First Act. (See http://www.dhs.state.il.us/OneNetLibrary/27897/documents/EEOPD/January_2018_FINAL_EEOPD_Recommendations_Report.pdf page 6) It is with this background that we submit our comments.

- People with disabilities are not referenced in the Executive Summary of the Unified State Plan. Given that 1) the unemployment rate of people with disabilities continues to be extremely high in Illinois and nationwide; 2) Illinois became an Employment First state in 2013; and 3) that WIOA has a significant focus on removing barriers to employment for people with disabilities, we believe that referencing people with disabilities in the Executive Summary is warranted. We would recommend that a Guiding Principle be added to the Executive Summary that states: “Illinois will ensure WIOA is implemented consistently with the principles of Employment First, so that competitive, integrated employment is the first option for people with disabilities.”
- EFE is pleased the Unified Plan itself references Employment First and the work of the EEOPD Task Force in several places. However, we recommend that the characterization of Employment First on page 147 be modified. Instead of using the phrase “given the option” when referencing competitive, integrated employment, we would recommend that the Unified Plan use the language from the Illinois

Employment First Act which states that competitive, integrated employment “shall be considered the first option” when serving people with disabilities of working age. This language change is critical because in Illinois, segregated sub-minimum wage employment is the default option for most people with intellectual and developmental disabilities, which is contrary to Employment First concepts generally, and of the law in Illinois specifically. (We note that the Employment First Law’s language is correctly referenced on page 232 of the Unified Plan.)

- In 2014, Governor Quinn issued an Executive Order implementing Employment First in Illinois. (see https://www2.illinois.gov/Pages/government/execorders/2014_8.aspx) The Executive Order required that “an Employment First Liaison shall be appointed within the Office of the Governor to implement Illinois’ Employment First Policy, in conjunction with the EEOPD and state agencies.” One year into the Pritzker administration, this Liaison position remains unfilled. We recommend that the Plan specifically state that this critical position be filled as soon as possible.
- EFE appreciates that the Unified Plan references the EEOPD Task Force and its recommendation that WIOA implementation be consistent with the principles of Employment First. (page 147 of the Unified Plan) However, we would recommend that the Plan go further and make a commitment to actually adopt this recommendation. Doing so ensures greater accountability.
- EFE supports the strategy to increase employer awareness. (see page 35) However, we think this employer awareness should include educating employers about the benefits of hiring people with disabilities and the resources that are available to support those efforts, such as the Job Accommodation Network – www.askjan.org
- The Unified Plan provides a couple of sample job descriptions. (see pages 43-47) However, it is imperative that job descriptions not result in excluding people with disabilities. For instance, both job descriptions indicate that the jobs require that workers “speak clearly so listeners can understand.” This requirement could result in excluding people with disabilities who have difficulty speaking. Today, assistive technology has leveled the playing field allowing many people with disabilities to successfully perform the job, such as through the use of augmentative and alternative communication devices. By changing the description to “*communicate* clearly so listeners can understand” it meets the goal of the job without excluding people with speech disabilities.
- Table 11 of the Unified Plan lists Target Population Characteristics. (see pages 63-64) EFE strongly recommends that the language in this table be updated to reflect current

accepted language. “Mental Retardation” and “MR” are used frequently in Table 11. However, those terms are no longer deemed appropriate and the use of “intellectual disability” and “ID” should be substituted.

- EFE is pleased to see that the Unified Plan references the federal Work Opportunity Tax Credit. (see pages 84-85) EFE recommends that the Unified Plan include concrete steps on promoting the WOTC. By doing so, more employers may utilize this resource, which would, in turn, result in more people with disabilities and other qualifying populations being hired.
- EFE is pleased that the Unified Plan references the critical role that technology plays for people with disabilities and the importance that such technology be accessible. (See page 92) And while it is helpful to reference that DHS/DRS has expertise to ensure that all websites and information systems are usable to people with disabilities, it is critical that there be a centralized process to ensure that all state digital information and technology is accessible, including in the acquisition, maintenance and updating of digital information and technology. We would also recommend that the word “usable” be changed to “accessible”, which has a more specific meaning.
- The Unified Plan references efforts to support people with disabilities with establishing their own businesses. However, the current Business Enterprise Program (BEP), managed by CMS, has resulted in very few disability-owned businesses being awarded contracts. The BEP statute allows sheltered workshops to qualify as a disability-owned and operated business. Last year, **97.5%** of BEP funds for disability-owned businesses (**\$90,673,344**) went to sheltered workshops, whereas only **2.5%** of BEP funds for disability-owned businesses (**\$2,351,048**) were given to businesses actually owned by people with disabilities. Sheltered workshops are the antithesis of Employment First and WIOA, as people with disabilities are in segregated settings and paid sub-minimum wage. Despite the passage of WIOA and an Executive Order issued by Governor Quinn in 2014 that specifically orders CMS to address this issue, nothing has changed. We recommend that the Unified Plan acknowledge this barrier and develop strategies to address it.
- The Unified Plan states that the State is “pursuing innovation in providing employment opportunities to individuals with disabilities by connecting them with businesses that match their skills and helping them overcome any barriers they have to employment.” (see page 96) EFE would appreciate more detailed information about this effort including specific activities, target numbers, etc.

- The Unified Plan references that Illinois' service delivery model as a "siloed" approach, but states there have been significant improvements. (page 96) EFE believes these silos continue to serve as a major impediment to the employment with people with disabilities, especially the silos between the Division of Rehabilitation Services (DRS) and the Division of Developmental Disabilities (DDD). Our understanding is that a Memorandum of Understanding (MOU) between DRS and DDD that would promote a more cooperative effort on employment has taken an extremely long time to resolve and no firm completion date has been agreed upon. We recommend that a strategy for the finalization of this MOU (and a similar MOU between DRS and the Division of Mental Health) be added to the Unified Plan.
- EFE is pleased to see that the Unified Plan references the need for greater support services alongside the provision of vocational services. (see page 116) We look forward to learning more details about DRS' efforts on this front.
- EFE appreciates that the Unified Plan states that Illinois is committed to ensuring both programmatic and physical accessibility to the one-stop delivery system. (see page 232) Unfortunately, the web link that appears to provide information about compliance monitoring is not functional.
- EFE was hoping that the Unified Plan would discuss how to address the issue of thousands of people with disabilities continuing to spend their days in sheltered workshops being paid sub-minimum wage. WIOA defines "employment" for people with disabilities as "competitive integrated employment," meaning people with disabilities must be paid the same wages as people without disabilities and interact with and get the same opportunities for career advancement as non-disabled co-workers. WIOA significantly limits the use of sub-minimum wage sheltered workshops, and focuses on preventing the direct placement of students with disabilities leaving high school into these programs. Additionally, the U.S. Supreme Court's decision in *Olmstead* has been interpreted to not only apply to integrated housing, but also to integrated employment. Under the Illinois Employment First Act, competitive integrated employment shall be the first option for people with disabilities, but this continues to be the exception and not the rule. The City of Chicago recently passed an ordinance that will phase out sub-minimum wage in Chicago. We recommend that the Unified Plan explicitly acknowledge that sub-minimum wage and sheltered workshops are significant barriers to competitive, integrated employment and explore concrete ways to address these barriers, including in-person outreach to people currently working in sheltered workshops being paid sub-minimum wage.

- EFE was also hoping that Individual Placement and Support (IPS) services would be highlighted in the Unified Plan. IPS is an evidence-based practice for promoting employment and primarily has been successfully utilized by the Division of Mental Health. EFE would like to see the Unified Plan discuss the successes of this program and how IPS can be expanded to assist more adults with mental illness and other disabilities, as well as assist students with disabilities as they transition from high school.

Again, we appreciate the opportunity to provide our comments to the Unified Plans. If you have questions or need any additional information, please contact: Barry C. Taylor, VP for Civil Rights and Systemic Litigation at Equip for Equality, barryt@equipforequality.org or 312-895-7317.