



# Attendance, Benchmarks, Breaks in Training, IEP Modifications

December 16, 2021

# Topics

- Attendance tracking requirements.
- Benchmark requirements.
- Breaks in Training.
  - Ceased Participation.
  - Payable Training Interruptions (PTI).
  - Vacation Break.
  - Potential Suspension Requests.
- IEP Modifications.

# Training Attendance

- Tracked on a bi-weekly basis.
- Form #006a Bi-Weekly Verification of Trade Training Attendance.
  - Due to career planner two business days after the end of the two-week training period.
  - Participant portion must be completed even if attending online courses.
  - Career planner must review submitted form to ensure:
    - Form is complete.
    - Participant did not miss any scheduled courses.
    - Instructor has answered the questions about the participant's progress and attendance.
    - Online class attendance verification included, if applicable:

# Training Attendance (cont.)

- Online/Distance Learning Attendance Verification.
  - Actual instructor signature on Form #006a and questions answered about progression and attendance.
  - Other method of verification (must contain required information):
    - Email from instructor:
      - Participant name.
      - Course name and number.
      - Two-week period being verified.
      - Answers to the following questions:
        - Has the participant attended all scheduled classes?
        - Is the participant successfully progressing through the listed course?
        - If no to either question, an explanation must be provided.

# Training Attendance (cont.)

- Training institution electronic system printout (must contact required information:
  - Participant name
  - Course name and number
  - Verification of log ins, grades, assignments completed, etc.

# Training Attendance (cont.)

- Case notes must be entered when Bi-Weekly Attendance is received.
- Case note types:
  - Received accurate attendance with no absences.
  - Received attendance for finals weeks.
  - Received attendance with absences for failure to attend all training class(es) and/or other training activities scheduled by the training institution.
  - Received attendance with absences for instructor cancelled class(es)/training institution scheduled breaks/weather days/campus closure.
  - Failed to provide verification of attendance or verification is incomplete.
  - Received missing/corrected bi-weekly attendance

# Training Attendance (cont.)

- **Received accurate attendance with no absences.**
  - The participant turned in bi-weekly attendance within two business days following the reporting period with no absences noted.
  - Ensure form is complete and signed by participant and instructors
  - Add a case management episode to appropriate case management service record (Trade – petitions up to 97,999 or WIOA – petitions 98,000+).
  - Enter case note:
    - **Case Note Subject:** Bi-Weekly attendance received with no absences for (enter two-week period dates).
    - **Case Note Language:** Bi-weekly attendance received for (enter two-week period dates). No absences noted.

# Training Attendance (cont.)

- **Received attendance for finals weeks.**
  - The participant turned in bi-weekly attendance within two business days following the reporting period with absences for finals weeks.
  - Finals weeks are considered weeks of training.
  - Two-week finals period for the training institution.
    - Based on training institution academic calendar.
  - Participant's finals are all in week one with no classes for finals during second week.
  - TRA payable for second week.



# Training Attendance (cont.)

- Ensure form is complete and signed by participant and instructors.
- Add a case management episode to appropriate case management service record (Trade – petitions up to 97,999 or WIOA – petitions 98,000+).
- Enter case note:
  - **Case Note Subject:** Bi-Weekly attendance received with absences for finals weeks on (enter two-week period dates).
  - **Case Note Language:** Bi-weekly attendance received for (enter two-week period dates). Participant missed classes on (enter dates of finals weeks) due to finals weeks.

# Training Attendance (cont.)

- **Received attendance with absences for failure to attend all training class(es) and/or other training activities scheduled by the training institution.**
  - The participant turn in bi-weekly attendance with absences for not attending all scheduled classes.
  - Ensure form is complete and signed by participant and instructors.
  - Add a case management episode to appropriate case management service record (Trade – petitions up to 97,999 or WIOA – petitions 98,000+).
  - Enter case note:
    - **Case Note Subject:** Bi-Weekly attendance received for (enter two-week period dates) with absences.
    - **Case Note Language:** Bi-weekly attendance received for (enter two-week period dates). Participant missed classes on (enter dates of missed classes) for (enter reason for missed classes). A Ceased Participation has been entered for the missed class(es).

# Training Attendance (cont.)

- Enter a **Ceased Participation Status Record** with the reason “Failed to attend all training class(es) and/or other training activity scheduled by the Training Institution”. The start and end dates are the days/weeks/period of the absence. Enter a dated comment in the **Comment Box** describing the reason for the missed class(es).

# Training Attendance (cont.)

- **Received attendance with absences for instructor cancelled class(es)/training institution scheduled breaks/weather days/campus closure.**
  - The participant turned in bi-weekly attendance with absences for cancelled classes.
  - Ensure form is complete and signed by participant and instructors.
  - Add a case management episode to appropriate case management service record (Trade – petitions up to 97,999 or WIOA – petitions 98,000+).
  - Enter case note:
    - **Case Note Subject:** Bi-Weekly attendance received for (enter two-week period dates) with absences.
    - **Case Note Language:** Bi-weekly attendance received for (enter two-week period dates). Classes were cancelled on (enter dates of cancelled classes) due to (enter reason for cancelled classes).
  - No Ceased Participation Status Record required.

# Training Attendance (cont.)

- **Failed to provide verification of attendance or verification is incomplete.**
  - If the participant fails to provide to bi-weekly attendance within two business days following the reporting period, or the verification is incomplete, the career planner will contact the participant and determine the reason for the missing/incomplete verification of attendance.
  - Add a case management episode to appropriate case management service record (Trade – petitions up to 97,999 or WIOA – petitions 98,000+).

# Training Attendance (cont.)

- Enter a case note:
  - **Case Note Subject:** Bi-Weekly attendance not received or is incomplete for (enter two-week period dates).
  - **Case Note Language:** Bi-weekly attendance was not received or is incomplete for (enter two-week period dates). A ceased participation has been entered.
- The career planner must contact the participant to obtain the missing/revised bi-weekly attendance and record all attempts in case notes.
- Enter a **Ceased Participation Status Record** with the reason “Failed to Provide Verification of Attendance”. The start and end dates are the two-week period dates for the missing attendance sheets. Enter a dated comment in the **Comment Box**.

# Training Attendance (cont.)

- **Received Missing/Corrected Bi-Weekly Attendance.**
  - When the missing/corrected Bi-Weekly attendance are received, the career planner will:
    - Review to ensure they are complete and correct.
    - If the attendance sheets are incomplete or indicate absences, follow the instructions on the previous slides for the appropriate scenario.

# Training Attendance (cont.)

- If the attendance sheets are complete and correct, the career planner will do the following:
  - Add a case management episode to appropriate case management service record (Trade – petitions up to 97,999 or WIOA – petitions 98,000+).
  - Enter a case note:
    - **Case Note Subject:** Bi-Weekly attendance received with no absences for (enter two-week period dates).
    - **Case Note Language:** Bi-weekly attendance received for (enter two-week period dates). No absences noted.
- Update the Ceased Participation Status Record Comment Box to indicate the missing attendance sheets were received and the date they were received.



# Ceased Participation

- A worker shall be determined to have ceased participation in a training program when the worker fails to attend all scheduled training classes and other training activities scheduled by the training institution in any week of the training program, without justifiable cause.
  - Participant fails to provide verification of attendance.
  - Participant fails to attend all training class(es) or other training activity scheduled by the training institution.
- Timely Entry important.
- Administrative Law Judge (ALJ) Determinations.
- Trade Readjustment Allowance (TRA) Overpayments.
- Illinois Department of Employment Security (IDES) adjudicating Ceased Participations.

# Ceased Participation

- **Career planner follow up to IDES adjudication of Ceased Participation.**
  - The career planner must review the Illinois Benefit Information System (IBIS) Claimant Issue List Screen, update the IWDS Ceased Participation Status Record Comment Box, add a Case Note with the outcome and close the record.
  - The impact of the adjudication must be considered and an IEP modification processed if appropriate.
  - The career planner must consider how the outcome of the adjudication affects the training , the participant's ability to complete the training plan on time, or at all, and update the benchmarks as appropriate.

# Ceased Participation (cont.)

- For both an affirmation (participant did ceased participation) or denial (participant did not ceased participation), the career planner will do the following:
  - Update the **Ceased Participation Status Record** with a dated comment detailing the outcome from the IDES adjudication in the **Comment Box** and enter a **Status End Date** (date of IDES determination).
  - Add a case management episode to appropriate case management service record (Trade – petitions up to 97,999 or WIOA – petitions 98,000+).
  - Add a **Case Note** providing information about the outcome of the IDES adjudication.
  - If the outcome affects the training plan, process an **IEP Modification**.

# BENCHMARKS

- Established when a participant enrolls in an approved training program so progress towards completing the training can be tracked.
- Purpose – Required by the Trade Regs for Completion TRA.
  - Up to 13 weeks of Completion TRA may be payable to assist the participant in completing a full-time training program that leads to a degree or Industry-Recognized Credential provided all the 60 Day Benchmarks are met.
- DOL requires two evaluation criteria to be met every 60 Days:
  - **Satisfactory Academic Standing** (not on probation or determined to be “at risk” by the instructor or training provider. Participant is receiving passing grades each term, enrolling in the required classes when offered, and in the timeframe allotted).
  - **On Track to Complete Training within the Agreed upon Timeframe** (based upon the progress of the participant in completing the training program by the merit staff approved planned training end date.)

## Benchmarks (cont.)

- Benchmarks are based upon passing grades each term, enrolling in the required classes in the proper sequence as listed on the Tracking Form, instructor attestation, and career planner consultation with the training provider and participant.
- Requirements are included in the Trade Benefit Rights and Obligations (BRO) and the IEP.
- Career planner must discuss 60 Day Benchmark requirements with the participant prior to the start of training.

## Benchmarks (cont.)

- Conducted at 60 day intervals from the first day of training.
- Entering more frequent reviews in IWDS will reset the 60 day review date.
- Recorded in the **In Training Status Record** in IWDS under **60 Day Review**.

# Benchmarks (cont.)

- **Determining if participant is meeting benchmarks.**
  - **Maintaining Satisfactory Academic Standing.**
    - Review **Bi-Weekly Attendance** forms and any information provided by the instructor/training institution and the participant.
    - Form provides space for instructor comments or concerns.
    - Example of a good entry:
      - Participant reported her current grades are an A and a B. She is passing her clinical practicum. Her cumulative GPA is 3.6. She continues to remain in good academic standing as defined by the training institution.

- **On Schedule to Complete Training within the Timeframe identified in the approved training program.**
  - Include any information from the **Bi-Weekly Attendance Form, Tracking Form**, the training institution's full-time and academic policies, information gathered from monthly reviews, and all other information from the training institution.
  - Factors that may affect the participant's ability to complete on time may include dropping or failing a class, switching from full-time to part-time, training institution course cancellations, program elimination, or a variety of other reasons.



# Benchmarks (cont.)

- Example of a good entry:
  - Participant continues to stay on track with her individual training plan. She continues to participate and progress successfully through her training program. This training program requires the completion of 92 credits. She has successfully completed 48.5 credits and is currently enrolled in 8 credits hours along with clinical practicum for the Spring semester which is full-time for the RN program. She will have 35.5 credits remaining if she successfully completes her classes Spring semester. Her planned end date for graduation is May 31, -2022. She is on target to complete training within the timeframe indicated on her Individual Employment Plan and ITA Projection. So far, customer has not failed any classes or taken any classes out of sequence.

# Benchmarks (cont.)

- **Benchmark Outcome Choices**

- **Satisfactory**

- The participant has met the benchmark.

- **Not Met**

- Upon failure to meet a benchmark, the career planner must warn the participant that eligibility for Completion TRA is in jeopardy. In consultation with the participant, the career planner may amend the training program. Select the appropriate outcome (warning or modification).

- **Not Met – Warning**

- Requires the **Trade Training Benchmark Warning Letter Commerce/Trade Form #006c** be completed and sent to the participant.
    - The date the training benchmark warning letter is mailed must be recorded in the **60 Day Review Comments Box**.

# Benchmarks (cont.)

- If a participant who has previously failed to meet a benchmark fails to meet a benchmark during a subsequent review, and the training plan cannot be modified, the career planner must notify the participant of ineligibility for Completion TRA. If the participant can demonstrate he/she has the financial resources to continue training, the participant may elect to continue in the approved training but will not receive any Completion TRA payments.
- **Not Met – Modification**
  - Requires the **Trade Training Benchmark Warning Letter Commerce/Trade Form #006c** be completed and sent to the participant.
  - The date the training benchmark warning letter is mailed must be recorded in the **60 Day Review Comments Box**.
  - A meeting must be held with the participant to modify the training program, if possible. Indicate the reason why the modification is necessary in the **60 Day Review Comments Box**.
  - Follow the **IEP Modification** process to obtain state merit staff approval.

# Benchmarks (cont.)

- **Not Met – No Completion TRA**

- Selected if a modification to the training plan is not feasible.
- This also requires the entry of a **Potential Suspension Request Status Record** utilizing the reason of **Not Met – No Completion TRA**.
- The career planner must complete and send the **Trade Potential Suspension Letter Commerce/Trade Form #003c** to the participant.
- This **Potential Suspension Request** requires state merit staff approval through the **IEP Modification** process.
- IDES will be notified of the **Potential Suspension Request** status. Potential Suspension Requests are transmitted to IDES nightly via the Potential TRA Training/Waiver File Maintenance Report. IDES will make the final determination if the participant meets the qualifying requirements for Completion TRA.
- The participant can appeal this decision.

# Benchmarks (cont.)

- **Additional Benchmark Reviews at End of Each Term**
  - At the end of each term.
  - Career planner must obtain a copy of the participant's grants and new class schedule.
  - Two additional benchmark reviews must be entered based on the grades/new class schedule.
  - If necessary, follow the steps on the previous slides based on the outcome of these two additional benchmark reviews.

# BENCHMARKS (cont.)

- Benchmark tracking report in IWDS:
  - Reporting – TAA Monitoring – 60 Day Training Review.
    - Enter your LWIA and # of Days (we suggest 55).
    - Shows how many days since last review.
    - If 60 or more, then you know a review needs to be entered.

# Breaks in Training

- Breaks in training occur for various reasons:
  - Holidays.
  - Breaks between semesters.
  - Participant request.
- Not included in total number of training weeks.

# Breaks in Training (cont.)

- **Types of Breaks in Training:**

- **Payable Training Interruption (PTI)**

- Scheduled break by the training institution and within the 30 days maximum allowed.
  - Listed in the training institution's published schedule or on its website.
    - Thanksgiving break, Winter break, Spring break, Summer break
- TRA will be paid.

- **Vacation Break**

- A break in training that is more than the 30 days maximum allowed.
- TRA will not be paid
- HCTC eligibility may be impacted.
- Requires processing of an IEP Modification and State Merit Staff approval.



## Breaks in Training (cont.)

- Both statuses (PTIs and Vacation Breaks) are transmitted to IDES on a nightly report to ensure proper payment of benefits.
- Timely and accurate entry in IWDS is important:
  - Ensure no TRA overpayments.
  - Allowable training weeks tracked and not exceeded.
  - PTIs are entered under the List Enrolled Services on the TAA Application for the participant.
  - Vacation Breaks are entered under the List TAA Status on the TAA Application.

# Breaks in Training (cont.)

- To determine whether a break in training is within the 30 day maximum allowed:
  - All calendar days beginning with the first day of the training break and ending with the last day of the break, as provided in the published schedule of the training provider, must be counted.
  - Saturday, Sunday, or official State or national holiday occurring during the scheduled break is excluded from the 30 day count if training normally would not be scheduled in the training program during those days if there were no break.

## Breaks in Training (cont.)

- A participant on a **PTI** who returns to training but it is more than the 30 day maximum allowed following the last date of attendance, he/she may have a TRA overpayment back to the start date of the **PTI**. IDES will make the determination and notify the participant.
- The **PTI Service Record** must be ended as Unsuccessful Completion with an end date the same as the start date.
- A **Vacation Break Status Record** must be entered with a start date the same date as the start date of the **PTI**.
- If the participant fails to return to training altogether following a **PTI**, he/she may have a TRA overpayment back to the start date of the **PTI**. IDES will make this determination and notify the participant.

# Potential Suspension Request (PSR)

- The following conditions will dictate when suspension of benefits may be necessary:
  - Participant was issued a Waiver from Training and refused suitable employment.
  - Participant enrolled in training, failed to start.
  - In training, ceased participation (dropped below full-time, quit).
  - Participant did not meet one of the qualifying requirements for eligibility in a Trade/TRA program.
  - Benchmarks not met – No Completion TRA.

# Potential Suspension Request (cont.)

- Complete Form #003c Potential Suspension Letter and send to participant.
- Enter a Potential Suspension Request Status Record in IWDS.
  - Start date must match date of Form #003c Potential Suspension Letter
  - Include a dated comment in the comment box detailing the reason for the PSR entry.
- Request state merit staff approval.

# IEP Modifications

- IEP modifications are required when anything in the participant's training plan changes.
- Absent extenuating circumstances, amendments to the training plan (including state merit staff approval) must occur:
  - Before the new service is provided.
  - Before the participant finishes the originally approved training program and prior to the originally scheduled date of completion.
- The combination of time spent in the originally approved training programs and the time it will take to complete the amended training program cannot exceed the duration of training limit for the type of training included in the training program.

## IEP Modifications (cont.)

- Participants who return to work, regardless of whether it is suitable or non-suitable work, may continue with the approved training plan on a full-time or part-time basis provided the training can be completed in the allowable training weeks and the participant can continue to satisfactorily meet benchmarks.
- Career planners must clearly inform participants who decide not to continue or complete a training program if he/she becomes reemployed that eligibility for TRA and HCTC may be affected before he/she chooses to cease participation in training.

## IEP Modifications (cont.)

- Participants who cease participation due to obtaining suitable employment or for good cause may be able to resume the training plan if the six criterion of training are still met, and he/she can complete in the remaining allowable training weeks.



# IEP Modifications (cont.)

- **Complete Trade Individual Employment Plan (IEP) Modification Form Commerce/Trade Form #014a.**
- **Invoking Equitable Tolling.**
  - Modification is requested after the fact.
  - Must provide justification.

# IEP Modifications (cont.)

- Waiver Changes:
  - Criteria.
  - Date Extension.
  - Revocation.
- Additional Service(s).
- End Service(s).
- Date Extension.
- Switch to a New Training Program.
- Changes in Cost.
- Change in Full-Time/Part-Time Status.
- Switch in On-Site/Online Status.
- Switch in Transportation/ Subsistence.
- Potential Suspension Request.
- Vacation Break.
- Final Cost Reconciliation.
- Close IEP.
- Other.

# IEP Modifications (cont.)

- IWDS Updates:
  - Appropriate Service and Status Record(s).
  - IEP Status Record.
    - Dated comment.
    - Updated IEP Amount, if applicable.
  - Add new episode to Case Management Service Record (WIOA or Trade, as applicable.)
  - Case Note.
- Required Forms to complete and documents to upload to IWDS:
  - IEP Modification Form (#014a).
  - New or updated Trade Forms as applicable for the type of modification being requested.
  - Any other relevant documents.

# IEP Modifications (cont.)

- Criteria for an amended training program
  - When requesting an IEP modification, the career planner must ensure the following criteria are met:
    - Criterion 1: A reasonable expectation of employment following completion of such training continues to exist.
    - Criterion 2: Training continues to be reasonably available to the participant.
    - Criterion 3: The participant continues to be qualified to undertake and complete such amended training.
    - Criterion 4: Such amended training continues to be suitable for the participant and available and at a reasonable cost.

# IEP Modifications (cont.)

- **End of training modifications**

- Following successful completion of a training program, IEP Status and Training, Travel, or other Service Records may remain open for a period not to exceed 90 days if there are anticipated future services.
- Ending services must be completed in a timely manner to ensure accurate reporting to United States Department of Labor (DOL).
- If a participant completes the training as state merit staff approved, that is a successful completion even if he/she does not pass an exam, obtain a credential, or gain a certification.

# IEP Modifications (cont.)

- **Closing the IEP**

- One all Trade services have been provided to the participant, and there are no anticipated future services, the IEP must be closed.
- This is an IEP Modification.
- If a final cost reconciliation is necessary and it has not already been completed, it can be included in this modification.



# IEP Modifications (cont.)



# FORMS - General

- Link to forms in e-Policy on Illinois workNet.

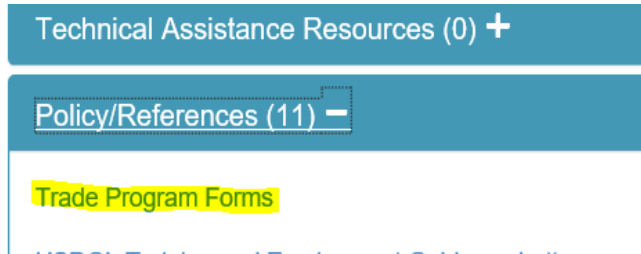
## General

**Chapter:** 11 **Section:** 1

**Effective Date:** 7/28/2009

**Expiration Date:** Continuing

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- <https://apps.illinoisworknet.com/WIOAPolicy/Policy/Home>
- Always double check the workNet site for the most recent forms.
- <https://www.illinoisworknet.com/tradeforms>



# Correspondence

- Emails.
  - Send all emails regarding Trade participants to state merit staff: Susan Boggs ([susan.boggs@illinois.gov](mailto:susan.boggs@illinois.gov)), Sheila Sloan ([sheila.sloan@illinois.gov](mailto:sheila.sloan@illinois.gov)), and Lori Graham ([lori.graham@illinois.gov](mailto:lori.graham@illinois.gov)).
  - Send all emails regarding Trade grants to Crystal Bigelow ([crystal.bigelow@illinois.gov](mailto:crystal.bigelow@illinois.gov)).
  - Always include a clear subject line that includes the LWIA, the purpose of email and participant name.
    - LWIA XX - IEP & New Occupational Training Approval Request for (participant name).
  - Do not combine information in emails for multiple participants. Each email should be for one participant only.



# DCEO Trade Contacts

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TRADE UNIT PHONE NUMBER:  
217-524-7826

# Trade Training

- Upcoming Training:
- Invitations sent out from Kiersten Baer at ISU
  - **January 6** – Potential Suspension Requests, Job Search Allowance, Relocation Allowance
  - **January 11** - Credential & Measurable Skill Gains, Exiting Participants, Success Stories
  - **January 13** – TAPR/GRS, Appeals, Fraud, Overpayments & Monitoring
- Additional training if needed
- Training recordings, presentations, and materials posted at:
  - <https://www.illinoisworknet.com/WIOA/Resources/Pages/Archived-Training.aspx>

# Questions

