

IDAHO WORKFORCE DEVELOPMENT COUNCIL PROPOSED WORKFORCE INVESTMENT ACT YOUTH PROGRAM CHANGES

Idaho's Workforce Development Council's Youth Program Design Committee has developed recommendations to establish a new Workforce Investment Act youth program design and is seeking broad public input regarding two waiver requests necessary to implement the committee's recommended design framework.

Background ~

In light of continuing federal program reductions, the committee sought input from other service providers to identify gaps in services to youth and to discuss how Workforce Investment Act resources might best be utilized in leveraging other partner resources. The committee also reviewed the national strategic direction to serve the neediest youth, which included priority service to out-of-school youth, those aging out of foster care and youth offenders. The committee's priority groups for youth program services were identified as follows:

- Youth who are involved with the juvenile justice system;
- Youth exiting foster care;
- Pregnant and parenting teens;
- Youth with disabilities;
- Out of school youth, and
- In-school youth who are in alternative high schools or enrolled in programs leveraging Carl Perkins and/or local technical education funds.

The federal act requires access to 10 youth program elements that if not commonly available to low income youth, must be made available with youth program resources. The committee determined that tutoring, alternative school, guidance and counseling are commonly available to low income youth and will be coordinated with other providers in the communities rather than purchased with federal funds. The federal law and regulations clarify that awarding a grant on a competitive basis does not apply to the design framework component where these services are provided by the grant recipient/fiscal agent. The design framework includes intake, assessment, development of an individual's service plan and overall case management.

The law authorizes the U.S. Department of Labor to waive certain statutory and regulatory provisions of the law to provide: increased flexibility to states in implementing reforms to the work force development system in exchange for state and local accountability for results including improved performance; and an opportunity for states to continue to organize services into a work force investment system through One-Stop Career Centers, which enhance the training and employment opportunities available to adults and youth.

Waiver Requests ~

The subcommittee's recommended design framework requires a federal waiver of two statutory and regulatory provisions of the Workforce Investment Act. These waiver requests have been previously submitted by several other states and approved. The waivers will align Idaho's youth service delivery structure with federal regulations and guidance advocating enhanced integration of youth services through the One-Stop system, offer consistent access to and delivery of a broader design framework, decrease staff costs and bring consistency to occupational classroom training processes for all program funding streams.

Written comments regarding the attached waiver requests may be submitted through Aug. 11, 2008 to

Ms. Kay Vaughan
Sr. Planner
Idaho Department of Labor
317 Main Street
Boise, Idaho 83735

Written comments may also be submitted online to WIAPlan@labor.idaho.gov

**STATE OF IDAHO REQUEST FOR WAIVERS
WIA YOUTH PROGRAM**

In compliance with WIA Section 189(i)(4)(B) and WIA Regulations 661.420(c), the State of Idaho is requesting two waivers from the U.S. Department of Labor related to WIA Youth program design:

An exemption from the competition requirement for the follow-up, support services and work experience components, to include internship and summer work experience, and having those services categorized as part of the design framework; and,

An exemption from the prohibition on using WIA Youth dollars to fund Individual Training Accounts (ITA's) for older youth.

INCLUDE YOUTH FOLLOW-UP, SUPPORT SERVICES, WORK EXPERIENCES AS FRAMEWORK SERVICES

A. Statutory Regulation to be Waived:

WIA Section 123, Section 117(h)(4)(B)(i), and 20 C.F.R. Part 664.400 require that eligible providers of youth services be selected by awarding a grant or contract on a competitive basis for youth activities and services.

B. Goals to be Achieved by the Waiver:

A waiver will integrate the coordination and provision of these youth activities with the elements of the Youth program design framework delivered through Idaho's One Stop system and its twenty-five One Stop Career Centers, all operated by the WIA fiscal agent, the Idaho Department of Labor. Integration of these services will increase customer choice and flexibility in the customer's service strategy with greater access to WIA as well as partner program services accessed through the One Stop system.

The waiver will ensure an efficient, cost-effective delivery system by eliminating duplicate processes among training providers for work experiences. Development of worksites, building relationships with work site supervisors, training staff to monitor sites, and setting up agreements, and processes for payment of youth is very labor intensive. With this system capacity developed at the One Stop Career Centers, it is more cost effective and eliminates a duplication of effort when the same, or very similar, services are offered by two or more organizations in the same community.

Granting the waiver will allow for a smoother flow of data that documents the delivery of youth services, as well as the outcomes that result from youth participation, since the organization that is providing framework services will be in a better position to understand where each youth is in relationship to his or her individual service strategy, when a youth has exited a WIA service or the WIA program, and when the period for follow-up begins.

The waiver will also support improved common measures reporting since the framework service provider will be in the best position to know when a WIA youth is also participating in another partner program, and therefore make a better administrative judgment as to when program completion will trigger the time period to determine a performance outcome under the new common measures.

The goals for the youth program under the waiver will be greater effectiveness, efficiency, and continuity of services. Local One Stop Career Centers will provide greater continuity of services for youth, resulting in higher retention rates. The case management relationship with participants is based upon a thorough knowledge of the youth, their employment plan, expected outcomes, and barriers. When this relationship continues, and services are seamlessly accessed, the youth is more likely to follow through with the service strategy in a timely manner, take advantage of available services that lead to positive change, and achieve longer retention after program exit.

C. State or Local Statutory or Regulatory Barriers:

Idaho has implemented WIA under federal law without any additional legislative or local limitations or requirements. No additional barriers need to be addressed.

D. Description of Individuals Impacted by the Waiver:

The individuals affected by this waiver will be older and younger youth customers, and organizations/agencies who might be interested in RFP opportunities to deliver youth services.

E. Opportunity for Public Comment and the Process for the Implementation of the Waiver:

This waiver was developed in response to the recommendations of Idaho's Workforce Development Council subcommittee, working with statewide youth providers to study and re-design WIA youth service delivery.

Opportunity for 30-day public comment was announced through press releases on July 9, 2008.

The Department of Labor, fiscal agent and grant recipient for WIA in Idaho, will work with its One Stop system management staff and partner organizations to ensure successful implementation of the waiver.

PROHIBITION ON USE OF YOUTH WIA DOLLARS TO FUND INDIVIDUAL TRAINING ACCOUNTS FOR OLDER YOUTH

A. Statutory Regulation to be Waived:

WIA Section 129 and WIA Regulations 29 C.F.R. 664.510 prohibit the use of WIA Youth dollars to fund Individual Training Accounts for youth.

B. Goals to be Achieved by the Waiver:

Approval of this waiver will allow WIA Youth service providers to employ the use of *Individual Training Accounts* (ITA's) for out-of-school youth. An ITA will allow youth to receive individual training in accordance with systems established for WIA Adult and Dislocated Worker programs. The ITA will generally be applicable to older youth who lack the occupational skills to be successful in employment and whose individual service strategy reflects that skill training is appropriate and necessary to attain self-sufficiency. The ITA gives service providers options for youth which maximize efficiency and customer choice.

It is currently possible to serve older youth with ITA's by dual-enrolling in the WIA Adult program. However, dual-enrollment requires duplicative processes, increasing costs for staffing and record processing. Youth below 18 years of age have no option for ITA's since they are not eligible for the Adult program.

The goals to be achieved by the waiver are to: increase the number of youth entering into employment; increase the percentage of youth receiving credentials; and, increase the number of youth being retained in employment.

C. State or Local Statutory or Regulatory Barriers:

There are no state or local statutory or regulatory barriers to implementing the requested waiver.

D. Description of Individuals Impacted by the Waiver:

This waiver will impact the processes used by frontline staff to meet the skill training needs of youth customers.

E. Opportunity for Public Comment and the Process for the Implementation of the Waiver:

This waiver was developed in response to the recommendations of Idaho's Workforce Development Council subcommittee, working with statewide youth providers to study and re-design WIA youth service delivery.

Opportunity for 30-day public comment was announced through press releases on July 9, 2008.

The Department of Labor, fiscal agent and grant recipient for WIA in Idaho, will work with its One Stop system management staff and partner organizations to ensure successful implementation of the waiver.