

U. S. Department of Labor



Employment and Training Administration

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February 26, 2002

Thomas E. Ivory
Director, Employment and Training Programs
Department of Labor and Employment
1515 Arapahoe Street, Suite 400
Denver, CO 80202-2117

Dear Mr. Ivory:

This is to confirm the discussion concerning the Colorado youth procurement waiver request that took place on February 12, 2002. The national and regional office staff reviewing the waiver request covered areas where further clarification would assist us in determining our recommendation to the Assistant Secretary on the disposition of this request. I apologize for the delayed response, but I was waiting for any additional comments review on the request by the national office procurement specialists, as we discussed during the call.

During the discussion, there was confusion expressed by the reviewers regarding which Workforce Centers are already able to compete to deliver youth services, and which Workforce Centers would need waivers (except to deliver non-framework or summer employment activities). It would be helpful if the proposed waiver plan made it clear that the requirement that is causing problems for Colorado local areas only applies to those Workforce Centers that are units of the local governments (counties, in this case) that are the local grant recipients or sub-recipients under WIA section 117(d)(3)(B). These sub-recipients are required to follow the contract procurement and sub-grant requirements for units of local government found at 29 CFR Section 97.36 and 97.37. Other Workforce Centers may already apply in any competitive selection process.

The outcomes proposed in the waiver plan (for both Waiver Parts A and B) are lower than the achievements on the same measures by the State in PY 2000. State staff pointed out that the youth program was slow in starting up and that outcomes achieved were not a good barometer because they reflected outcomes for relatively few youth within local areas. The proposed outcomes in the request reflected reasonable increases over JTPA historical experiences.

It was agreed that the State staff would propose programmatic outcomes that reflect improved service to youth, which may or may not be for the required performance measures. These could be other quantitative and qualitative ways to measure the programmatic impact of each of the requested waivers on youth in the program. For these proposed outcomes, the State will indicate



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how success and/or progress will be measured or determined.

The state will provide a description of how assignment of youth to activities will be managed locally in order that youth would not be restricted to in-house activities, if the Part B waiver is granted. The state also agreed to also explain how state and/or local procurement procedures assure that local Workforce Centers applying to provide services if the Part B waiver is granted would have an arms-length relationship with the entity procuring the providers.

We appreciate your help in clarifying these areas. Please call Mary Lou Lofgren at 303-844-1672 if you have questions. We are available to provide further technical assistance.

Sincerely,



MARY LOU LOFGREN

Supervisor, Denver Office of Youth Services