OAS
327832

Iowa Workforce Development
Thomas J. Vilsack, Governor Sally J. Pederson, Lt. Governor Richard V. Running, Director

Putting Iowa to Work

July 29, 2002

Ms. Emily DeRocco
Assistant Secretary
Employment and Training Administration
United States Department of Labor
200 Constitution Avenue N.W. Room S2307
Washington, D.C. 20210

Dear Ms. DeRocco:

The State of Iowa is requesting a waiver from the requirements of Workforce Investment Act Section 122 (c) (5) and 20 CFR 663.530. Specifically, we are requesting to extend the period of "Initial Eligibility of Training Providers" through December 31, 2003, thereby postponing the "Subsequent Eligibility of Training Providers" period until January 1, 2004. The purpose of this extension is to identify the broadest range of eligible providers, thus enabling program participants to make better choices for training. The waiver will also to ensure that training providers have adequate time to fulfill their responsibility to submit performance and cost information on each program of training services in order to determine subsequent year eligibility. This waiver request is written in accordance with the format identified in WIA Section 189(i)(4)(B) and WIA Regulations at Section 661.420(c).

Prior to December 31, 2003, Iowa will implement a comprehensive system to administer the eligible provider process in a manner to assure that significant numbers of competent providers, offering a wide variety of training programs and occupational choices, are available to customers as required by WIA Regulations at Section 663.500. Iowa will partner with the Iowa Department of Education and other State education entities to share information and enhance future efforts to collect data from eligible training providers.

Iowa is committed to the philosophy of maximizing customer choice and assuring that all significant population groups are served. This waiver, if approved, will provide us with the increased flexibility to meet the standards required by the Workforce Investment Act and ensure State and local accountability for the results of our system.

If you have questions about the waiver, please contact Pam Wood at (515) 281-9018.

Sincerely,

Richard V. Running,
Director

cc: Tom Wilson, DOL Region VII

Workforce Development Center Division
150 Des Moines Street • Des Moines, Iowa 50309-5563 • Phone 515-281-9328 • Fax 515-281-9096 • www.iowaworkforce.org

State of Iowa
Waiver Request
Workforce Investment Act
Implementation of Subsequent Eligibility of Training Providers

Iowa Workforce Development (IWD), the administrative entity for the Workforce Investment Act, is requesting a waiver to extend the period of "Initial Eligibility of Training Providers" through December 31, 2003, thereby postponing the "Subsequent Eligibility of Training Providers" period until January 1, 2004. The waiver would allow Iowa additional time to identify the broadest range of eligible providers to enable individuals to make informed choices relating to their training goals and will also ensure that training providers have adequate time to fulfill their responsibility to submit performance and cost information on each program of training services in order to determine subsequent year eligibility. This waiver request is written in accordance with the format identified in WIA Section 189(i)(4)(B) and WIA Regulations at Section 661.420(c).

A. **Statutory Regulations to be Waived:** WIA Section 122(c)(5) and WIA Regulations at Section 661.530 require a time limit for initial eligibility for training providers followed by the implementation of the subsequent eligibility process.

B. **Goals to be Achieved by the Waiver:**

- Increase WIA performance information available on training providers initially eligible and on the State List of Eligible Training Providers.
- Identify the broadest range of eligible providers to enable individuals to make informed choices relating to their training goals.
- Implement a comprehensive system to administer the eligible provider process in a manner to assure that there are significant numbers of competent providers, offering a wide variety of training programs and occupational choices to maximize customer satisfaction.
- Provide time to offer technical assistance to training providers that are uncertain about the data requirements necessary to receive subsequent eligibility status.
- Provide technical assistance to our Regional Workforce Investment Boards to increase their knowledge about the Eligible Training Provider system.

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 Waiver Goal and Programmatic Outcomes:** During Program Year 2001 (July 1, 2000 – June 30, 2001), Iowa issued 659 ITAs. For Fiscal Year 2002 to date, 1017 ITAs have been issued.

The State's approved training provider system currently contains 106 training providers offering 1189 individual training programs. The state's community colleges, universities, private for-profit, and non-profit training agencies are listed on the WIA Certified Training Provider website located at:
http://www3.iwd.state.ia.us/wia/trainingproviders.nsf/

Comparing the number of ITAs issued to the number of programs initially certified indicates that not all of the certified programs even have WIA participants enrolled. Therefore, there is no information on some training programs to determine subsequent year eligibility.

At the present time, our administrative staff and Regional Workforce Investment Boards (RWIBS) do not have sufficient data or training to determine which training providers should be certified or re-certified. Another barrier identified is the Family Education Rights Privacy Act (FERPA). Without the waiver, the Regional Workforce Investment Boards and Iowa Workforce Development will be forced to determine subsequent year eligibility for training providers with very little WIA performance data available.

This waiver will allow more time for IWD staff to build a comprehensive system that supports customer choice and satisfaction. Suggestions and best practices identified by RWIBS, the Iowa Department of Education, training providers and customers will be built into this system.

The waiver will also enable IWD to provide technical assistance so that training providers can submit performance and cost information on each program of training services for determining subsequent eligibility.

Training and technical assistance will also be provided to administrative staff and RWIBS to increase their knowledge about the Eligible Training Provider system.

Negotiations are beginning with the Iowa Department of Education and other State education entities to share eligible training provider information and determine the best method to use regarding cost and performance data collection.

By December, 2002, an ITA/ETP handbook will be developed to educate staff, RWIBS, potential and current training providers and customers regarding Individual Training Accounts and Eligible Training Provider requirements.

E. **Description of Individuals Impacted by the Waiver:** All of our customers, including training providers, Regional Workforce Development Boards, IWD staff and ITA users will be positively affected by this waiver.

- Eligible providers will have adequate time to submit performance and cost information on each of their training programs for determining subsequent eligibility.

- Regional Workforce Development Boards and IWD staff will have sufficient performance information and training to make informed recommendations regarding training provider eligibility based upon established criteria.

- ITA users will have the broadest range of eligible providers to choose from in order to select the best training provider that offers programs relating to their training goals.

- All IWD customers will have access to ITA/ETP handbooks that specifically set forth requirements and processes affecting them.

F. **Description of the Process to Monitor Progress:** Acting Division Administrator Tony Dietsch and Bureau Chief Mike Wilkinson will monitor progress being made on the actions, goals and timelines proposed by the waiver.

G. **Description of the Public Comment Process:** Copies of all comments received on the requested waivers will be forwarded to the appropriate Regional or Affiliate Office.