

IDAHO

DEPARTMENT OF LABOR



DIRK KEMPTHORNE, GOVERNOR
Roger B. Madsen, Director

February 17, 2004

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 Idaho respectfully requests an extension of an existing waiver regarding the Workforce Investment Act's (WIA) time limit on the period of initial eligibility of training providers (20 CFR 663.530), which extended the period of initial eligibility through June 30, 2004. This request/waiver is being submitted by the Idaho Department of Labor as the state administrative entity for the Workforce Investment Act.

Idaho's original request was to waive the subsequent eligibility provisions as outlined in Section 122 (c) and (d) of the WIA legislation. Although the U.S. Department of Labor did not provide a waiver for the state's specific request, it did waive the time limit on the period of initial eligibility that was extended through June 30, 2004.

As mentioned in the earlier request for waiver, our training providers are still expressing concerns with the implementation of subsequent eligibility requirements. The concerns include the following: confidentiality (FERPA compliance), excessive administrative burden and costs associated with tracking all students, time delays with UI wage records, the difficulty in establishing statistically valid processes for adjusting UI wage record data based on economic, geographic, and demographic factors of the local area and characteristics of the population being served, and establishing a consumer report based on a wage record system that underreports employment rates for training programs. The WIA reauthorization also raises opportunities to streamline training providers' subsequent eligibility under a "new" WIA. Therefore, we request that the initial eligibility period be extended through June 30, 2005.

Idaho is committed to delivering quality employment and training programs under WIA. It is our belief that if the waiver is not extended, the implementation of the subsequent eligibility criteria will prevent providers from participating in WIA. We believe that a continuation of this waiver until June 30, 2005 will continue to provide the broadest range of training options for the state's WIA participants. We appreciate your consideration of our request for an extension of the approved waiver.

If you have any questions, please contact Rico Barrera, Workforce Systems Bureau, at (208) 332-3570 extension 3316.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger B. Madsen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Roger B. Madsen
Director

cc: Cheryl Brush, Workforce Systems Bureau Chief
John Humphrey, U.S.DOL Region 6 Administrator