

February 26, 2004

John Humphrey
Acting Regional Administrator for Region 6
US Department of Labor
Employment and Training Administration
77 Stevenson Street, Suite 830
San Francisco, CA 94105-2920

Dear Mr. Humphrey:

Oregon applied for and was granted a waiver to extend the period of initial eligibility of training providers, as described in the Workforce Investment Act (WIA) Section 122(c)(5), and 20 CFR 663.530 to allow the state to more fully develop an effective subsequent eligibility process.

In this letter Oregon requests to extend the duration of the waiver until June 30, 2005. Oregon originally requested that date but DOL approved the waiver through the current period of WIA authorization that is until June 30, 2004, pending the WIA reauthorization process.

Oregon made an early decision to maximize customer choice by having a robust Eligible Training Provider List (ETPL). The state assumed the majority of the data collection burden for the training providers, and made the commitment to collect the required performance data at the state level through existing data and reporting systems. As a result, Oregon has a very extensive ETPL for a small state with a large, rural area with few training providers. There are currently more than 1,200 training programs on the ETPL, and the list continues to grow. This is in contrast to many other states where providers have withdrawn their programs from the ETPL because of the burden of data gathering and reporting.

Even after working on it for three years, Oregon still has not developed an effective way to calculate the "all students" data at the state level. Some progress has been made, but data systems are still not comparable and some of the performance data, while available for the report card, are not completely verifiable or available as yet for job matching using the UI wage record. If training providers had to provide this data themselves, we would see a dramatic decrease in the numbers of providers and programs on the list.

WIA reauthorization would have solved these problems for us, through amendments easing the reporting requirements. Because Oregon is committed to provider accountability, the state would have developed a subsequent eligibility process that works for the state using the data we have. Now, however, without reauthorization, Oregon is faced with an early expiration date for its existing waiver. We request an additional year of the waiver, until June 30, 2005, with the anticipation that the WIA will be reauthorized and performance reporting requirements amended before that date.

Thank you very much for your consideration of this request. If you have questions or comments, please feel free to call me or Greg white, Executive Staff of the Oregon Workforce Investment Board, at 503-378-8648 ext. 465, greg.white@state.or.us.

Sincerely,

Cam Preus-Braly
Commissioner

C: Betty Lock