



The Honorable Chester J. Culver  
Governor of Iowa  
1007 East Grand Avenue  
De Moines, Iowa 50319

Dear Governor Culver:

As part of Iowa's modification to the State Plan for Title I of the Workforce Investment Act (WIA) and the Wagner-Peyser Act, the State submitted waiver plans to request that the State's waivers of statutory and regulatory requirements under WIA be approved for the remainder of Program Year (PY) 2009 (copy enclosed). These requests are written in the format identified in WIA section 189(i)(4)(B) and 20 CFR 661.420(c) and appear to meet the standard for approval at 20 CFR 661.420(e). This action is taken under the Secretary's authority to waive certain requirements of WIA Title I, Subtitles B and E, and sections 8-10 of the Wagner-Peyser Act. The following is the disposition of the State's submission.

In a letter dated June 30, 2009, ETA granted Iowa approval of the following waiver through June 30, 2010:

- Waiver of the provision at 20 CFR 663.530 that prescribes a time limit on the period of initial eligibility for training providers.

The approval for this waiver remains in effect. The letter dated June 30, 2009 granted temporary extensions of the remainder of Iowa's waiver requests. The previous approval of the extensions is hereby terminated and replaced by decisions set forth in this letter. Unless otherwise indicated, all waiver approvals that follow apply to both WIA formula funds and funds made available under the American Recovery and Reinvestment Act of 2009.

#### Requested Waivers

Requested Waiver: Waiver of WIA Section 133(b)(4) to increase the allowable transfer amount between Adult and Dislocated Worker funding streams allocated to a local area.

The State is requesting a waiver to permit an increase in the amount a state is allowed to transfer between the Adult and Dislocated Worker funding streams. The State is granted this waiver through June 30, 2010. Under the waiver, transfer authority will be limited to 50 percent. This limitation provides states flexibility while ensuring

for the WIA Adult and Dislocated Worker programs. As stated in ETA Training and Employment Guidance Letter (TEGL) No. 14-08, Section 19, issued on March 18, 2009, this waiver does not apply to funds made available through the American Recovery and Reinvestment Act of 2009. However the State is permitted to transfer up to 30 percent of ARRA funds between programs under WIA and under the Department of Labor Appropriations Act of 2009. This authority is discussed in TEGL No. 14-08, change 1.

Requested Waiver: Waiver to permit the State to apply the WIA regulations at 20 CFR 661.300(f) to one local workforce investment area.

The State is requesting a waiver to permit the State to apply 20 CFR 661.300(f) to the local workforce investment area identified in Iowa's original waiver request (Region 11). Under the waiver, the Governor may designate the State Board to carry out the roles and responsibilities of the Local Board for this area. We are granting the waiver through December 31, 2009. After this date, a Local Board must resume the roles and responsibilities for the local area for which the State had this waiver authority.

Requested Waiver: Waiver of WIA Section 181(e) to permit the use of WIA funds of up to \$5,000 to capitalize a small business in concert with entrepreneurial or small business training.

The State previously was granted a waiver of WIA Section 181(e) to permit the use of WIA funds of up to \$5,000 to capitalize a small business in concert with entrepreneurial or small business training. The State did not submit a request to extend this waiver. The waiver approval period has lapsed, and expires as of the date of this letter.

Requested Waiver: Waiver of WIA Section 101(31)(B) to increase the employer reimbursement for on-the-job training.

The State previously was granted a waiver to permit an increase in employer reimbursement for on-the-job training through a sliding scale based on the size of the business. The State did not submit a request to extend this waiver. The waiver approval period has lapsed, and expires as of the date of this letter.

Requested Waiver: Waiver of WIA Section 122 to waive the eligible training provider list process for eligible providers adding programs.

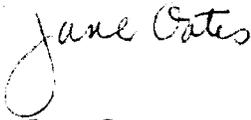
The State requested to waive the eligible training provider list process for eligible providers adding programs. Training provider eligibility provisions are excluded from the general WIA waiver authority, and cannot be waived; therefore, we cannot provide the State a waiver to waive performance in the subsequent eligibility determination process, including the ETPL process for providers adding new programs.

The only flexibility ETA can offer is to extend the period of initial eligibility, which is a waiver that the State currently has.

The approved waivers are incorporated by reference into the State's WIA Grant Agreement, as provided for under paragraph 3 of the executed Agreement, and this constitutes a modification of the State Plan. A copy of this letter should be filed with the State's WIA Grant Agreement and the approved State Plan. In addition, as required by TEGL No. 14-00, Change 3, the State should address the impact these waivers have had on the State's performance in the WIA annual performance report, due on October 1 of each year.

We look forward to continuing our partnership with you and achieving better workforce outcomes. If you have any questions related to the issues discussed above, please contact Byron Zuidema, the Regional Administrator for Region V, at 312-596-5403 or [Zuidema.Byron@dol.gov](mailto:Zuidema.Byron@dol.gov).

Sincerely,

A handwritten signature in cursive script that reads "Jane Oates". The signature is written in black ink and is positioned above the typed name.

Jane Oates  
Assistant Secretary

Enclosure

cc: Rochelle Bradley, Federal Project Officer for Iowa, ETA Chicago Regional Office  
Byron Zuidema, the Regional Administrator, ETA Chicago Regional Office

## Waivers

The State of Iowa is requesting the following new waivers for the Program Year 2009.

I. To implement the Summer Youth Program under the Recovery Act approval of the following waiver is being requested:

Waiver of the youth performance measures for out-of-school youth ages 18 to 24 served with Recovery Act funds beyond the summer months who participate in work experience only. This waiver would allow the State to use the work readiness indicator as the only indicator of performance for such youth, the same measure that applies to summer youth only participants. The waiver would only be applicable for the first six months following the summer of 2009 (i.e., October to March). The State is requesting this information under TEGL No. 14-08, Section 16.A and waiving of provisions of the requirements of the Workforce Investment Act of 1998, Section 136 youth measures, along with TEGL 17-05, and 17-05, Change 1, that relate to common measures for youth only.

Justification for this waiver – This waiver would allow the local RWIBs to focus on developing high quality jobs in areas of occupational interest through the ARRA. This will allow the worksite the opportunity to train youth in high demand occupations, emerging occupations and include “green” jobs. It is anticipated that as many youth as possible will be placed in work experiences that will extend beyond the May 1 – September 30 summer only placement period. This will provide a unique opportunity to focus on and place youth in work experiences that would not otherwise have been available.

The waiver requires the following format as provided in WIA ss189(i)(4)(B) and WIA Regulations 20 CFR 661.420(c)

- a. Statutory and/or Regulatory Requirement to be Waived Iowa is seeking a waiver of certain provisions of the requirements of the Workforce Investment Act of 1998, Sections 136 youth measures, along with TEGL 17-05, and 17-05, Change 1, that relate to common measures for youth only. The State of Iowa requests this waiver based on TEGL 14-08, page 37 “Waiver of performance measures for youth who participate in work experience only.”
- b. State or Local Statutory or Regulatory Barriers  
There are no state or local barriers. Upon approval of the waiver it will be incorporated into the state policy and distributed to the local RWIBs.
- c. Goals and Expected Programmatic Outcomes of the Waiver  
This waiver will provide a simplified performance measure for tracking the youths’ success in completing work experience beyond the summer months. It also allows the regional staff to work with youth to promote “green jobs”. The longer term nature of the work experience allows for the development of more high demand skills. The ultimate outcome is not burdening the local RWIBs with meeting additional youth performance measures.
- d. Individuals Impacted by the Waiver

This will allow for a more streamlined approach to enrolling larger numbers of youth in the ARRA and possible movement into the regular formula funded adult program under the Workforce Investment Act for credential training.

- e. Processes used to monitor implementation, provide notice to any local RWIB affected by the waiver, provided a period of comment and receive meaningful comment from business and labor.

Iowa Workforce Development is the entity responsible for the ARRA summer employment program affected by this waiver. IWD will assume the lead role in monitoring the implementation of the waiver. This oversight will be provided by the five WIA workforce program coordinators at the State level and by the regional staff at the local level.

All regional directors have been given instructions via Field Memo 09-04 on providing information regarding the implementation of the ARRA summer employment program and adult and dislocated worker strategic planning. This waiver will also be discussed with and approval requested from the State Workforce Board in a conference call on April 21, 2009. All local customer service plans and the State Plan modification are posted 30 days for public comment. Those comments will be incorporated into the modification of the State Plan for ARRA.

### **Waivers**

The following are existing waivers for which the State of Iowa is requesting an extension:

I. Iowa Workforce Development(IWD), the State administrative entity for the Workforce Investment Act (WIA), is requesting a waiver to:

A. Permanently waive performance in subsequent eligibility determination process for eligible training providers to begin in PY2007; and

B. Waive the eligibility determination process for a State University, Community College or College of Technology (Center of Applied Technology) who is adding new programs to their training curriculum.

A. Permanently Waive Performance in the Subsequent Eligibility Determination for Eligible Training Providers

Iowa is fortunate to have been consistently successful in having subsequent eligibility determination waived since 2004 with the last waiver request in place through June 30, 2009. However, with the waiver period nearing its end, current Eligible Training Providers will once again begin expressing their concerns over performance tracking.

Iowa markets the Workforce Investment Act's (WIA) concept of Eligible Training Providers (ETP) and for the most part, has experienced success. However many of Iowa's training providers are finding that the reporting requirements are not realistic, based on the limited number of enrollments and the cost of developing a reporting system that would gather information relating to wages and/or placement of those individuals participating in their

programs. Data for those participants who received assistance through an Eligible Training Provider under WIA is available at this time; however, data for all individuals participating in educational programs is not easily captured by the Eligible Training Providers. IWD is concerned that performance tracking requirements have the potential of causing Eligible Training Providers to opt out of the Eligible Training Provider List (ETPL). This could create limited training choices for rural areas and threaten the Individual Training Account System (ITA). Permanently waiving the reporting requirements for Eligible Training Providers would keep previously approved providers on the ETPL and provide customers with training option choices. Some Eligible Training Providers that are on Iowa's list do not have the capability to collect the required performance data.

Some of the concerns expressed by training providers are noted below:

- ◆ Creating and maintaining a system that would collect required WIA data would be costly and burdensome, especially for smaller training providers.
- ◆ For many providers, the relatively small number of WIA-eligible participants accessing training services through their ITAs would not justify the resources that would have to be committed to collect required data.
- ◆ Many training providers do not have systems in place or the staff available to produce required performance information.
- ◆ The majority of training providers on the Eligible Training Provider List do not have production data available to meet subsequent eligibility requirements.
- ◆ There may be potential violations of data privacy especially related to the Family Educational Rights Privacy Act (FERPA).
- ◆ WIA data requirements might present an additional burden to the amount of data already being collected from students at a time when most businesses, schools, and colleges are trying to streamline processes to be more customer friendly and cost efficient.

Currently the RWIB's do not have sufficient data to make informed decisions about which training providers should be re-certified. Since information on employment and earnings come from the unemployment insurance wage system, there is a tremendous delay in obtaining wage information for the quarter after exit and three quarters after exit. A provider denied subsequent eligibility could consider any decisions made by the RWIB's regarding provider's eligibility arbitrary and open to challenge.

IWD as administrative entity makes all decisions regarding which providers are on the Eligible Training Provider List.

Iowa understands the need for accountability and supports efforts to ensure that customers are making informed decisions based on quality data. However, when the ability to effectively collect required data is severely limited, the resulting chaos could destroy customer choice and

severely limit the use of Individual Training Accounts (ITAs). The primary goal of this request to permanently waive subsequent eligibility determination is to ensure that WIA participants are able to continue to choose a wide variety of effective and quality training opportunities.  
Waiver Plan

Section 189(i)(4) of the Workforce Investment Act permits a state to seek waivers of statutory or regulatory requirements, as well as setting forth what information must be provided in seeking such a waiver. The waiver request format follows WIA Section 189(i)(4)(B) and WIA Regulation at 20 CFR Part 661.420.

1. Statutory Regulations to be waived:

WIA Regulations at Section 663.530-540 (WIA Section 122(c)(5)), specifies the time limits for initial eligibility and/or subsequent eligibility.

2. Describe action the State has undertaken to remove State or local statutory or regulatory barriers:

Iowa has implemented the Eligible Training Provider process as required under WIA laws and regulations. No additional State requirements have been added to impede this process; therefore, there are no additional State regulatory barriers that need to be removed.

3. Waiver goals and measurable programmatic outcomes, if the waiver is granted:

a. Continue to increase the number of Eligible Training Providers and retain those already approved to ensure maximum customer choice. A measurable outcome would be the monitoring of the number of Eligible Training Providers. Iowa currently has many approved training providers of which most are based at a state university, community college or college of technology. These providers have expressed their concern about the type, amount and cost of data collection for subsequent eligibility and would choose not to participate or not re-apply for the ETPL.

b. Maintain the highest level of provider accountability and satisfaction by developing and implementing a customer friendly system. Satisfaction level and error rate monitoring are measurable outcomes.

c. Research the potential of developing an online initial eligibility application process. Monitoring the use of online applications may be used to determine measurable outcomes.

d. Add a feedback screen to the existing online ETPL application to enable IWD to capture comments regarding the use of the system.

4. Describe any individuals affected by the waiver:

The waiver will impact either directly or indirectly all statewide participant training customers, training service providers, the Iowa RWIB and the general business

community. The largest direct impact is anticipated to affect individual training customers and training providers with the former experiencing either the greatest cost or benefit.

5. Describe the processes used to:

(i) Monitor the progress in implementing the waiver:

Progress will be monitored in two phases related to the system's design, development, and implementation. Progress will be measured by the number of ETPL approvals. Internet usage will be monitored by observing the number of provider users and other customers. Satisfaction will be monitored to ensure that all users have a quality experience. IWD will monitor the ETPL site on a frequent basis.

(ii) Provide notice to any Local Board affected by the waiver:

Iowa has 15 regions and these RWIB's have local board responsibilities. The draft waiver was posted on the State WIB website, and all RWIB members were notified it was available for review and comment.

(iii) Provide any Local Board affected by the waiver an opportunity to comment on the request:

Iowa has 15 regions and these RWIB's have local board responsibilities. The draft waiver was posted on the State WIB website, and all RWIB members were notified it was available for review and comment.

(iv) Ensure the opportunity for meaningful public comment, including comment by business and organized labor, on the waiver:

A general public comment period was provided through posting the proposed Waiver request on the State WIB website for 30 days, and notifying all RWIB members and RWIB interested persons it was available for review and comment. After the public comment period, the proposed Waiver request will be presented to the State WIB Executive Committee for approval, during a publicly noticed meeting.

B. Waive the eligibility determination process for a State University, Community College or College of Technology who are adding new programs to their training curriculum.

We request this waiver so that Iowa can better provide the most effective and efficient method of approving programs from a state university, community college or college of technology with the least amount of burden to the Eligible Training Provider. The training programs provided by these agencies are offered through an accredited institution and are of high quality.

The current process is for the Eligible Training Provider to apply for subsequent eligibility on the ETPL each time they add a new program or make changes to a program's curriculum. This process creates a burden for those Eligible Training Providers (state university, community college or college of technology that are frequently adding or updating programs on the ETPL.

This burdensome process also discourages ETP from being demand-driven and responsive to the workforce training needs of business and industry. Only for the institutions listed above.

The subsequent eligibility requirement for every program offered by an Eligible Training Provider could cause delays in providing training services to participants resulting in an individual not getting registered for a class. Ensuring that these providers are eligible and on the ETPL without requiring them to apply for eligibility for every program they offer will simplify the process and result in the availability of more training opportunities for participants in a timelier manner.

IWD will continue to require that training providers are approved and placed on the ETPL before any WIA funds are spent for training. However, once it has been verified that the training provider is on the ETPL the participant would have the expectation that any program offered by the Eligible Training Provider is approved as well.

#### Waiver Plan

Section 189(i)(4) of the Workforce Investment Act permits a state to seek waivers of statutory or regulatory requirements, as well as setting forth what information must be provided in seeking such a waiver. The waiver request format follows WIA Section 189(i)(4)(B) and WIA Regulation at 20 CFR Part 661.420.

#### 1. Statutory Regulations to be waived and goal:

WIA Regulations at Section 663.530 (WIA Section 122(c) (5)), specifies the time limits for initial eligibility and/or subsequent eligibility. The goal is to eliminate the burden, to a state university, community or tribal college or college of technology (center of applied technology), of applying for each new program.

#### 2. Describe action the State has undertaken to remove State or local statutory or regulatory barriers:

Iowa has implemented the Eligible Training Provider process as required under WIA laws and regulations. No additional State requirements have been added to impede this process therefore, there are no additional State regulatory barriers that need to be removed.

#### 3. Waiver goals and measurable programmatic outcomes, if the waiver is granted:

- a. Streamline eligibility status of programs for a state university, community or tribal college or college of technology (center of applied technology).
- b. Retain Eligible Training Providers.
- c. Eliminate delays in enrolling a participant in a training program.
- d. Encourage the creation of demand-driven training programs that more quickly meet the workforce training needs of business and industry.

#### 4. Describe any individuals affected by the waiver:

The waiver will impact either directly or indirectly all statewide participant training customers, training service providers, the Iowa RWIB and the general business community. The largest direct impact is anticipated to affect individual training customers and training providers with the former experiencing either the greatest cost or benefit.

5. Describe the processes used to:

(i) Monitor the progress in implementing the waiver:

Stakeholders affected will have a reduced burden that is effective upon approval of the waiver.

(ii) Provide notice to any Local Board affected by the waiver:

Iowa has 15 regions and these RWIB's have local board responsibilities. The draft waiver was posted on the State WIB website, and all RWIB members were notified it was available for review and comment.

(iii) Provide any Local Board affected by the waiver an opportunity to comment on the request:

Iowa has 15 regions and these RWIB's have local board responsibilities. The draft waiver was posted on the State WIB website, and all RWIB members were notified it was available for review and comment.

(iv) Ensure the opportunity for meaningful public comment, including comment by business and organized labor, on the waiver:

A general public comment period was provided through posting the proposed Waiver request on the State WIB website for 30 days, and notifying all RWIB members and RWIB interested persons it was available for review and comment. After the public comment period, the proposed Waiver request will be presented to the WIB Executive Committee for approval, during a publicly noticed meeting. Committee members will be presented with all public comments received during the public comment period, and asked for additional public comments during the meeting. Comments approved by the Committee will be incorporated into this Waiver request. Formal action will be taken by the State WIB Executive Committee to approve the proposed Waiver request for submittal to USDOL.

## II. Delegation of WIB Responsibilities in Local Workforce Investment Area 11

### A. Identify the statutory or regulatory requirements that are requested to be waived and the goals that the state intends to achieve as a result of the waiver.

The State of Iowa is requesting a waiver to 20 CFR Part 661.300(f) of the Workforce Investment Act (WIA) regulations. This provision allows states that operate as a single local workforce investment area to use the State Workforce Investment Board to carry out the requirements of the

local workforce investment board. While Iowa is not a single workforce service area, the intent of this waiver request is to permit the State Board to assume the responsibilities of the local workforce board in a specific region of the State.

Local Workforce Investment Area 11 in Iowa, commonly referred to as Region 11, consists of the counties of Boone, Dallas, Jasper, Madison, Marion, Polk, Story, and Warren. This workforce investment area constitutes the most populous region of the State and, as such, has an impact on Iowa WIA operations that extends far beyond the borders of the region. State performance achievement, effective use of a substantial percentage of State and federal resources, and even the perception of the employment and training system in Iowa are all substantially influenced by the activities and operation of WIA and related employment programs in Region 11.

The State of Iowa wants to establish Region 11 as a model of success for the employment and training system in Iowa. By providing the authority for the State Workforce Investment Board to act as the Regional WIB, direction and guidance for the system will be provided to both State and local service providers and agencies. In addition, engagement with a broader spectrum of State and local constituencies will dramatically expand the level of input and ownership in workforce programs. Rather than reducing the level of local control and authority, this action will actually expand regional control and authority under the direction of the Iowa Workforce Investment Board.

The current level of local control in Region 11 is insufficient. The region continues to suffer from the effects of a scandal that resulted in disallowed costs, the resignation and subsequent federal indictment of top officials of a service provider, and broad negative publicity. Resignations of many members of both the chief elected officials' board and the WIB also occurred. In addition, the members of the chief elected officials' board have voted to dissolve their agreement to carryout responsibilities under the WIA, and default that authority to the Governor, effective July 1, 2008

The State of Iowa requests this waiver to permit the State Workforce Investment Board to assume the responsibilities of the local workforce board in Region 11. Approval of this request will allow the same latitude and authority for this region as that granted to State Boards who serve this function for an entire State. That authority is essential at this point in time for this region. The State board will direct efforts to establish the principles of local input and direction to the workforce system in the region, and to regain the level of trust and confidence that residents of the region must have in that system.

The State board intends to significantly expand the level of local involvement with the employment and training system. That involvement will include continued access to members of the existing WIB in an advisory capacity. In addition, a number of other business-related and workforce development boards or committees will be solicited by the State board to advise and guide the one-stop system in central Iowa. Some of these groups have not previously been engaged with WIB activities, and include:

- The Greater Des Moines Partnership for Polk, Dallas, and Warren counties, represented exclusively by business.

- Central Iowa Works – a strategic intermediary of primarily business members whose purpose is to provide guidance to the education system and the workforce system, on the challenges they face with recruitment and retention issues. The members also establish the industries that will be priorities in the development of career pathways.
- The Regional Innovation Leadership team established by the Regional Innovation Grant (RIG) received in the wake of the Maytag plant closing.

The State Board intends that the approval of this waiver request will significantly improve the level of local involvement in the oversight and operation of the employment and training system of central Iowa, as envisioned by the principles and goals of the WIA.

B. Describe the actions that the State has undertaken to remove State statutory or regulatory barriers.

There are no state statutory or regulatory barriers to implementation of this waiver.

C. Describe the goals of the waiver and the expected programmatic outcomes if the request is granted.

The goals of this waiver request are basic, yet essential:

- Streamlined administration of services;
- Increased level of input into the system from all constituencies;
- Provide sufficient time to receive technical assistance from the Department of Labor to develop a Regional Workforce Board that does not meet the statutory requirements under the Workforce Investment Act but will provide the functional oversight.
- Expanded capacity to align business needs with education and economic development activities;
- Increased efficiency in the regional workforce system;
- Enhanced and integrated services in the regional one-stop center;
- Increased numbers of participants served;
- Restoration of trust and confidence in the system by consumers.
- It is anticipated that the new oversight board will be in place by June 30, 2010.

D. Describe the individuals impacted by the waiver.

Job seekers, businesses, and the residents of Iowa Region 11 will be positively impacted by this waiver. The intent is to provide the most efficient and effective structure for workforce and economic development in the region. Service provision will be more closely coordinated to the extent that customers will not be aware of programs or funding sources for the services that they receive. In this way, services can be provided in innovative yet functional processes to better meet the needs of all interests. Program resources will be used in the most efficient manner in order to maximize the number of recipients of these services.

E. Describe the process used to monitor the progress in implementing such a waiver, and the process by which notice and an opportunity to comment on such request has been provided to the local board.

The State Workforce Investment Board and Iowa Workforce Development will be monitoring the implementation of this waiver and assessing the achievement of the goals that it intends. Frequent and formal customer satisfaction surveys will be initiated to support the assessment process. As customers of the system, business, labor, and economic development interests will be asked for feedback on the effectiveness of the system. That feedback will significantly comprise the expanded level of regional input that the waiver envisions.

Compliance with all appropriate laws and regulations will be maintained through normal compliance and fiscal on-site monitoring reviews. Progress in program achievement will be tracked both in terms of process measures (numbers served, level of services provided, etc.) and outcome measures (federal performance goals).

A modification to the State Plan for Wagner-Peyser and Workforce Investment Act Programs, which includes the substance and intent of this waiver, was been made available for comment. The content was made available on the Iowa Workforce Development website, and public notice was provided in the Des Moines Register newspaper. Formal written notice of the plan modification was also provided to business and labor organizations, state agencies, and the chief elected official and regional workforce investment board chairs.

Two comments were received on the proposed plan modification. One comment supported all of the proposals. The other comment, from a current WIB member, included the following statement: "I would urge that the local RWIB stay in place as an "Advisory Board" to the State RWIB for the reasons stated above for the betterment of the communities in Region 11 and most importantly the clients we serve." Accordingly, this waiver request indicates the intent to continue to solicit input from members of the existing WIB.

Waiver III. Identify the statutory or regulatory requirements that are requested to be waived and the goals that the state intends to achieve as a result of the waiver

Iowa is requesting an extension to the existing waiver to allow the transfer of 100% of funds between Adult and Dislocated Worker funding streams. This waiver will allow regional boards to respond to specific needs in their areas that may be created by significant numbers of worker dislocations, changes in the local economic environment, intent to increase services to specific populations, recission of previously allocated funds, reduction in annual formula allocation or similar issues. This request is a waiver from the Workforce Investment Act Section 133(b)(4), and 20 CFR667.140.

Iowa is committed to customer service, and this waiver will provide the flexibility to meet customer needs as they arise. The waiver will support both federal and state goals to support the local direction for resource use, will continue to emphasize the training element of the WIA program, and will provide the flexibility of merged funding streams while maintaining core service delivery in the One-Stop Centers supported by Wagner-Peyser funding streams.

Regional Workforce Investment Boards must initiate any requests for the transfer of funds. State policies have been established to ensure that such transfers will not negatively impact

performance achievement or the potential to acquire additional program resources, such as National Emergency Grants. In such cases, the state will have the authority to deny transfer requests.

B. Describe the actions that the State has undertaken to remove State statutory or regulatory barriers.

There are no state statutory or regulatory barriers to implementation of this waiver.

C. Describe the goals of the waiver and the expected programmatic outcomes if the request is granted

- Allow the maximum flexibility to ensure that all WIA eligible adults and dislocated workers may receive services.
- Allow the Regional Workforce Investment Boards to respond to significant worker dislocations. This applies specifically to dislocations that may be numerous in one region but more than one location, none of which have the same NAICS codes, but the number does not meet the 50 or more required for National Emergency Grants
- Response to recessions mandated by Congress to allow the continuation of obligations made to current enrollments for the completion of necessary services or training plans.
- Response to congressional reductions in annual formula allocations. The ability to move funds will allow the Regional Workforce Investment Boards to meet the needs of the regional eligible populations seeking assistance under the WIA Program.

D. Describe the individuals impacted by the waiver

Allow the local RWIBs increased flexibility to transfer funds between the adult and dislocated worker programs will result in expanded services to businesses in the region and increased employment and training opportunities. This would positively impact businesses and those individuals seeking employment and training services.

E. Describe the process used to monitor the progress in implementing such a waiver, and the process by which notice and an opportunity to comment on such request has been provided to the local board

The local Customer Service Provider will provide written notice to all RWIBs regarding any implementation of programmatic changes made possible due to the increased flexibility allowed by the waiver. The State Workforce Program Coordinators and Administrator for the Workforce Investment Act will monitor the expenditure levels of each local area to ensure they are consistent with the levels established by the fund transfer. Additionally, all funds transfers will be incorporated into the regional contract by the Financial Management Department at the State Level.

RWIBs requesting fund transfers between programs will be required to provide the following information to their designated Workforce Program Coordinator and Financial Management. The RWIB will be required to provide the following information:

- Effective date of the fund transfer;
- Amount of funds to be transferred;
- Local RWIB's assessment of conditions creating a need for the transfer; and
- How the transfer will meet contracted performance targets and critical workforce needs of the region.

Iowa appreciates the flexibility afforded to states through the waiver process and anticipates the waiver plan provides adequate accountability and improved performance for USDOL approval.