

April 13, 2012

Mr. Todd Yamamoto
Acting Regional Administrator
U.S. Department of Labor/ETA
90 ih St., Suite 17-300
San Francisco, CA 94103-1516

Via e-mail: Yamamoto.Todd@dol.gov and WIA.PLAN@dol.gov

RE: PY2012 Idaho WIA/W-P Five-Year State Plan Submission and Request to Temporarily Extend Current Plan, Waivers and Performance Goals until September 15, 2012.

Dear Mr. Yamamoto,

In response to the final State Integrated Workforce Plan Requirements for Workforce Investment Act Title 1/Wagner-Peyser Act under Training and Employment Guidance Letter (TEGL) 21-11, the state of Idaho is requesting a temporary extension of its State Plan, current negotiated performance targets and waivers through September 15, 2012, at which time a new five-year State Integrated Workforce Plan will be submitted.

Idaho is keenly aware of and embraces ETA's vision of joint planning across programs for greater efficiency in service and cost. The state is currently engaged in a variety of operational and organizational changes involving its One-Stop partner programs and the Idaho Workforce Development Council to increase the workforce development system's responsiveness to the needs of employer and job-seeking customers. Such efforts include:

- **A plan for designated regional or industry focused liaisons throughout the state.** Liaisons will be tasked with staying abreast of workforce and economic development activities and challenges and voicing these activities/challenges to the Workforce Development Council to ensure statewide alignment and streamlined efforts.
- **A strong emphasis on business services within the One-Stops primarily focused through the state's Workforce Investment Act and Wagner-Peyser programs.** Idaho's One-Stop Career Centers have implemented local and regional business solutions specialists focused on serving high-growth industries yielding self-sustaining wages and engaging in workforce and economic development activities as a method of better facilitating the connection to employment for job seekers.
 - o Idaho expects to further utilize these direct industry connections (established through the newly proposed council organization and the One-Stop business solutions specialists) as conduits for real-time workforce information driving education and training program development and leading to a system that more efficiently responds to the needs of industry and the workforce.
- **Integration of the Unemployment Insurance program** with the same administrative support team that oversees Idaho's 25 One-Stop Career Centers which deliver Wagner-Peyser, Workforce Investment Act Youth, Adult and Dislocated Worker, Veterans Employment &

Training, Migrant and Seasonal Farm Workers, Trade Adjustment Assistance and other workforce programs.

- **An assessment of Wagner-Peyser and One-Stop System staff training needs** throughout Idaho's One-Stop Career Centers that will identify potential process improvements and drive subsequent statewide training efforts.

The following represents Idaho's currently approved waivers and current negotiated performance targets proposed for this temporary extension.

Currently Approved Idaho Waivers:

- To extend the waiver of the time limit on the period of initial eligibility for training providers {20 CFR 663.50}
- To use common measures reporting {WIA Section 136{b}}
- To allow the Workforce Development Council to serve as a local board for the statewide planning region {20 CFR 661.300(f)}
- To exempt the competition/procurement requirement for the follow-up, support services and work experience components, to include internship and summer work experience, and having those services categorized as part of the design framework {WIA Section 123, Section 117(h)(4)(B)(iL and 20 CFR Part 664.400}
- To exempt the prohibition of using WIA Youth dollars to fund Individual Training Accounts (ITAs) for older youth {WIA Section 129 and 29 CFR 664.510}
- To enhance On-the-Job Training (OJT) opportunities by increasing employer reimbursement rates up to 90% for participating employers 101{31}(8) and 20 CFR 663.170}

Current Idaho WIA/W-P Performance Targets:

PERFORMANCE GOALS FOR PY 2011 AND PY 2012		
WIA Adult Programs		
1. Entered Employment Rate		78%
2. Retention Rate		82%
3. Average 6 Month Earnings		\$10,000
WIA Dislocated Worker Program		
4. Entered Employment Rate		80%
5. Retention Rate		85%
6. Average 6 Month Earnings		\$12,000
WIA Youth		
7. Placement in Employment or Education		70%
8. Youth Attainment of a Degree or Certificate		60%
9. Literacy and Numeracy Gains		25%
Wagner-Peyser		
1. Entered Employment Rate		62%
2. Retention Rate		75%
3. Average 6 Month Earnings		\$11,000

This temporary extension will:

- ensure adequate time for an updated analysis of Idaho's labor market and industry needs,
- allow for improved cross-program, partner coordination, input and planning based on a new labor market analysis, and
- provide ample opportunity for public comment and response to Idaho's new five-year strategic plan.

We appreciate your consideration of Idaho's request to extend its current State Plan, waivers and current negotiated performance targets.

Sincerely,

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Roger B. Madsen
Director