

AUG 28 2013

The Honorable Richard Scott
Governor of Florida
The Capitol
400 South Monroe Street
Tallahassee, Florida 32399-0001

Dear Governor Scott:

The Employment and Training Administration (ETA) is pleased to respond to your requests for a waiver of statutory and regulatory requirements under the Workforce Investment Act (WIA). 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 original request was written in the format identified in WIA section 189(i)(4)(B) and 20 CFR 661.420(c), and meets the standard for approval at 20 CFR 661.420(e). The following is the disposition of the State's request to modify an existing 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 was previously granted a waiver to permit an increase in the amount a state is allowed to transfer between the Adult and Dislocated Worker funding streams. Under the previously granted waiver, the transfer authority was limited to 50 percent. To help mitigate the effects of funding reductions in many local areas, the State is now requesting to increase the transfer authority to 75 percent. The State is approved to transfer up to 75 percent between the Adult and Dislocated Worker funding streams through June 30, 2014.

The approved waiver is 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. 29-11, the State should address the impact this waiver has 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 Toni Buxton, the Federal Project Officer for Florida, at (404) 302-5367 and Buxton.Toni@dol.gov.

Sincerely,

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

Eric M. Seleznow
Acting Assistant Secretary

Enclosures

cc: Eugene Caso, Acting Regional Administrator, ETA Atlanta Regional Office
Toni Buxton, Federal Project Officer for Florida

Rick Scott
GOVERNOR



Jesse Panuccio
EXECUTIVE DIRECTOR

July 22, 2013

Mr. Eugene Caso, Acting Regional Administrator
United States Department of Labor
Employment and Training Administration
Sam Nunn Atlanta Federal Center
61 Forsyth Street, S.W., Room 6M12
Atlanta, Georgia 30303

Dear Mr. Caso:

Pursuant to the administrative flexibility offered in Training and Employment Guidance Letter No. 27-12, the State of Florida is submitting the enclosed request for a waiver of the Workforce Investment Act (WIA) Section 133(b)(4) and 20 CFR Part 667.140 to allow sixteen of Florida's twenty-four regional workforce boards to transfer up to 75% of the formula funding between their WIA Adult and the WIA Dislocated Worker Programs. Approval of this waiver request will help the state further its efforts to integrate service delivery at its one-stop career centers and provide greater flexibility to local areas in structuring their workforce investment systems during this time of reduced state and federal funding.

Florida's workforce system received substantial reductions in funding in all of its major workforce programs that have resulted in layoffs, closure of some one-stop centers, and the reduction in services at other centers. The reductions come at a time when there continues to be strong demand from the unemployed and businesses for services. Approval of the requested waiver will provide regional boards the flexibility to use local WIA resources in a manner that best meets their local demand.

Thank you for your consideration of this request. Please call Mike Lynch with our Bureau of One Stop and Program Support at (850) 245-7193 if you have any questions relative to this request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Clendenning', is written over a white background.

Tom Clendenning
Director, Workforce Services

Enclosure

TC/ml

cc: Chris Hart
Scott Fennell
Lois Scott

Florida Department of Economic Opportunity | Caldwell Building | 107 E. Madison Street | Tallahassee, FL 32399

866 FLA 2345 | 850.245.7105 | 850.921.3223 Fax

www.floridajobs.org | www.floridajobs.gov | www.facebook.com/FLDEO

Workforce Investment Act Waiver Request

Date: July 22, 2013

State: Florida

Agency: Department of Economic Opportunity (DEO)

Statutory and/or regulatory requirements to be waived

WIA Section 133(b)(4) and 20 CFR Part 667.140 state that a Local Board may transfer, if such a transfer is approved by the Governor, not more than 20 percent of the funds allocated to the local area for a fiscal year between Adult employment and training activities and Dislocated Worker employment and training activities. Subsequent appropriation language has, in some cases, increased the percentage to 30 percent. Florida currently has a waiver that allows regional boards to transfer up to 50% between the two programs. This request asks for that authority to be increased to 75%.

Actions undertaken to remove state or local barriers

There is no State or local statutory or regulatory barrier to implementing the proposed waiver.

Goals and expected programmatic outcomes of waiver

The state identified in its 2012-2016 State Strategic Workforce Plan its intent to embrace and support the following national strategic priorities:

- Implementation of a demand-driven system
- System reform to eliminate duplicative administrative costs and to enable increased training investment;
- Enhanced integration of service delivery through one-stop career centers; and,
- Enhanced use of waivers to provide greater flexibility to local areas in structuring their workforce investment systems.

The requested waiver will provide increased flexibility for the local areas in allocating and expending Adult and Dislocated Worker funds. Such flexibility will enable local areas to better serve the needs of their customers and will heighten their ability to respond to changes in the local labor market and meet the needs of their local communities. Funding from the adult program and Wagner-Peyser programs are the primary support for the operation of local one-stop career centers that provide access for both job applicants and employers to engage the workforce system and receive

services. During the recent recession and the continuing tight labor market, the regional workforce boards have indicated that most dislocated workers want to return to employment and do not want training. In this tight labor market, more customers are asking for basic core and intensive services to help them quickly return to work. Adult funding stream is more flexible in using to help support the infrastructure and operating costs of local one-stop centers that provide the core and intensive services necessary to assist all adults (including dislocated workers) obtain help to return to work as quickly as possible.

Individuals impacted by the waiver

Florida has experienced a 12% decrease in its WIA funding; a 20% decrease in its TANF funding; and, a 6% decrease in its Wagner-Peyser funding for the current program year that began July 1, 2013. In Florida, the workforce system operates the work component of the state's TANF program and the loss of that funding coupled with the loss of WIA Adult funding will impact the state's low-income population. Although there has been a decrease in the overall dislocated worker funding, funding for that program over the last several years has been significantly more than funding for the adult program. Florida has a state requirement to use a minimum of 50% of its combined adult and dislocated worker training funding for training services so funding will still be available for dislocated workers (whether from the dislocated worker or the adult funding streams) who chose to enroll in that service. The loss of both TANF and WIA Adult funding impacts the system's capability to serve its low-income population. Approval of the waiver will allow the system to increase the funding available through the WIA adult program to help offset the loss of funding from TANF. It also will allow the continued provision of services to assist businesses and employed workers in need of training to either obtain (get a better job) or sustain employment at a self-sufficient wage.

Process for monitoring progress in implementation

The State has already survey all boards and fifteen of the state's 24 regional workforce boards have indicated a need for the additional transfer authority. The implementation of this policy is monitored by the WFI and the Department of Economic Opportunity as they continue to monitor all WIA performance and the progress toward goals and objectives expressed in the State Plan. Information contained in the State's management information system and financial management tracking system is reviewed and reported to the local areas and Workforce Florida, Inc. (WFI) on a regular basis. Regular monthly expenditure reports of formula WIA funding by region is provided to the State Board. Performance information on customers served and

outcomes are regularly posted on several dashboards that are available to the state, local managers, and the public.

Notice to affected local boards

Local boards were fully engaged in the initial process when the state developed a waiver request to allow the local boards to transfer 100% of their funding between the adult and dislocated worker program funding streams. That request was denied although the USDOL did approve a 50% transfer. All of the state's 24 boards were surveyed and asked whether they would request a waiver to transfer up to 75% between their adult and dislocated worker funding streams. The majority (15 of the 24) indicated that they would request a waiver. No board was opposed to the state making the request. Attached is information provided by each of the 15 regional boards that have indicated that they will request a waiver to allow them to transfer up to 75% of the funding between their adult and dislocated worker programs. The development of this request was done in response to requests from the regional workforce boards.

Public Comment

The state published on its web site its earlier request for a waiver to transfer up to 100% of the funding between the adult and dislocated worker funding streams. No public comments were received. The state has published this new waiver request on both the DEO and the Workforce Florida, Inc. (WFI) (the state workforce board) web sites. The earlier waiver request was adopted by the state workforce board (WFI) at a public meeting and this amended request was discussed at a more recent meeting of the Board.

Workforce Escarosa, Inc.
Request for 75% Transfer Waiver between WIA Dislocated Worker and Adult Program Funds
June 28, 2013

Funding Reductions for Workforce Escarosa, Inc., include the following:

Funding Category	2013 2014 Allocation	2012 2013 Allocation	Reduction	Percentage
WIA Adult	\$1,063,000	\$1,222,146	(\$159,146)	-13.0%
WIA Dislocated Worker	\$1,127,014	\$1,176,455	(\$49,441)	-4.2%
WIA Dislocated Supplemental Award	\$ 239,910	\$ 260,289	(\$20,379)	-7.8%
WIA Youth	\$1,292,624	\$1,631,426	(\$338,802)	-20.8%
Welfare Transition program	\$1,308,285	\$1,657,310	(\$349,025)	-21.1%
Reemployment Assistance Services	\$ 75,794	\$ 71,991	\$3,803	5.3%
Wagner Peyser	\$ 666,689	\$ 713,773	(\$47,104)	-6.6%
TOTAL:	\$5,773,296	\$6,733,390	(\$960,094)	-14.3%

Factors Related to Need for Transfer Authority:

- Cost Allocation process will require that WIA Adult funds be allocated to cover a larger portion of upfront services to include job search assistance due to reductions in Wagner Peyser and significant reductions in WIA Youth and TANF
- Of the WIA participants served, **only 1 in every 5 participants** who are receiving financial assistance for training is a dislocated worker.
- Escarosa has done extensive outreach to dislocated worker to increase their participation in retraining services, but has had little to no success in recruiting dislocated workers for retraining services.
- The 75% transfer waiver will allow Escarosa to continue to support WIA Adult participants through ITAs for training services; without the transfer, financial support will be limited to two terms per year (omitting both summer terms) and will reduce future intakes into the WIA Adult program.
- Training related items needed to attend school (uniforms, immunizations, tools, supplies) will be limited and may be discontinued for WIA Adult participants.
- The 75% transfer waiver will allow Escarosa to continue to support On-the-Job-Training and Customized Training services to area businesses; otherwise, those services will not be offered past July 1, 2013.
- For FY 2012 – 2013, Escarosa expended approximately \$1.5 million on tuition and books only (does not include training related items); without the 75% waiver this will be reduced to approximately \$800,000 for FY 2013 – 2014 (reduction of 45%).
- For FY 2013 -2014, approximately \$570,000 of WIA Adult will be needed to support Wagner Peyser and the Welfare Transition Program.

Workforce Development Board of Okaloosa and Walton Counties.
Request for 75% Transfer Waiver between WIA Dislocated Worker and Adult Program Funds
July 3, 2013

Funding Reductions for the Workforce Development Board of Okaloosa and Walton Counties (Region2) include the following:

Funding Category	2013 2014 Allocation	2012 2013 Allocation	Reduction	Percentage
WIA Adult	\$445,378	\$510,128	(\$64,750)	-12.7%
WIA Dislocated Worker	\$383,560	\$487,561	(\$104,001)	-21.3%
WIA Dislocated Supplemental Award	\$ 81,649	\$ 107,864	(\$26,215)	-24.3%
WIA Youth	\$364,484	\$422,575	(\$58,091)	-13.7%
Welfare Transition program	\$394,235	\$444,500	(\$50,265)	-11.3%
Reemployment Assistance Services	\$ 34,588	\$ 35,897	(\$1,309)	-3.6%
Wagner Peyser	\$ 373,954	\$ 403,002	(\$ 29,048)	-7.2%
TOTAL:	\$2,077,848	\$2,411,547	(\$333,699)	-13.8%

Factors Related to Need for Transfer Authority:

- Region 2's lower unemployment rate results in a smaller pool of local dislocated worker pool population. Region 2 continues to conduct extensive outreach activities to reach dislocated eligible population to increase their participation in retraining services. Outreach results have resulted in limited recruitments.
- The 75% transfer will allow Region2 to continue to provide/support On-the-Job Training and Employed Worker training services to local businesses.
- The ITA Training expenditures percentage will create the opportunity to achieve the more obtainable goal and more in line with the current ITA expenditures.
- The 75% transfer will broaden the possible procurement of allowable training related items needed for WIA training individuals (ie uniforms, tools, supplies).
- The 2013/2014 Adult budget will be closer to the 2012/2013 Adult budget.

Chipola Regional Workforce Development Board, Inc.
Request for 75% Transfer Waiver between WIA Dislocated Worker and Adult Program Funds
June 28, 2013

Funding Reductions for the CRWDB include the following:

Funding Category	2013 2014 Allocation	2012 2013 Allocation	Reduction	Percentage
WIA Adult	\$ 471,584	\$ 544,212	(\$ 72,628)	-13.34%
WIA Dislocated Worker	\$ 244,696	\$ 211,362	\$33,334	15.78%
WIA Dislocated Supplemental Award	\$ 52,089	\$ 81,041	(\$28,952)	-35.72%
WIA Youth	\$ 395,914	\$ 400,768	(\$ 4,854)	-1.21%
Welfare Transition program	\$ 264,814	\$ 304,049	(\$ 39,235)	-12.90%
Reemployment Assistance Services	\$ 15,787	\$ 14,512	\$ 1,275	8.79%
Wagner Peyser	\$ 151,103	\$ 164,452	(\$13,349)	-8.11%
TOTAL:	\$1,595,987	\$ 1,720,396	(\$124,409)	-7.23%

Includes transfer between Adult and DW in PY 12 funds

Factors Related to Need for Transfer Authority:

- Cost Allocation process will require that WIA Adult funds be allocated to cover a larger portion of upfront services to include job search assistance due to reductions in Wagner Peyser and significant reductions in WIA Youth and TANF
- Dislocated workers in the region are seeking employment and appear adverse to training due to current financial and family situations.
- The CRWDB has done extensive outreach to dislocated worker to increase their participation in retraining services, but has had little to no success in recruiting dislocated workers for retraining services.
- The 75% transfer waiver will allow CRWDB to continue to support WIA Adult participants through ITAs for training services and supportive services related to training; without the transfer we will be forced to limit funding for WIA Adults and money allocated for DW will not be fully utilized.
- Training related items needed to attend school (uniforms, immunizations, tools, supplies) will be severely restricted for WIA Adult participants which will cause a significant number of participants to drop from the training program.
- The 75% transfer waiver will allow the CRWDB to continue to support On-the-Job-Training and Customized Training services to area businesses. We note these services are well received by both the business and individuals in our region as they provide immediate financial relief for the individual as well as direct cause for the employer to consider WIA participants.
- Decreases in time spent on other programs have shifted cost allocation towards WIA programs. With significant more time currently being spent on WIA Adult an inability to shift funds towards the area of greatest need with cause cut backs in other programs due to an inability in WIA Adult to properly cover allocated costs per our approved cost allocation plan.

Gulf Coast Workforce Board
Request for 75% Transfer Waiver between WIA Dislocated Worker and Adult Program Funds
July 2, 2013

Funding Reductions for the Gulf Coast Workforce Board, Inc., include the following:

Funding Category	2013 2014 Allocation	2012 2013 Allocation	Reduction	Percentage
WIA Adult	\$513,384	\$616,074	(\$102,690)	-16.7%
WIA Dislocated Worker	\$615,322	\$634,251	(\$18,929)	-3.0%
WIA Dislocated Supplemental Award	\$ 130,023	\$ 222,167	(\$92,144)	-41.5%
WIA Youth	\$535,989	\$642,728	(\$106,739)	-16.6%
Welfare Transition program	\$476,006	\$587,072	(\$111,066)	-18.9%
Reemployment Assistance Services	\$ 42,885	\$ 40,327	\$2,558	6.3%
Wagner Peyser	\$ 316,606	\$ 345,349	(\$28,743)	-8.3%
TOTAL:	\$5,773,296	\$6,733,390	(\$457,753)	-14.8%

Factors Related to Need for Transfer Authority:

- Cost Allocation process will require that WIA Adult funds be allocated to cover a larger portion of upfront services to include job search assistance due to reductions in Wagner Peyser and significant reductions in WIA Youth and TANF
- Of the WIA participants served, **only 37% of participants** who are receiving financial assistance for training are dislocated workers.
- GCWB has done extensive outreach to dislocated worker to increase their participation in retraining services, but has had little to no success in recruiting dislocated workers for retraining services.
- The 75% transfer waiver will allow GCWB to continue to support WIA Adult participants through ITAs for training services; without the transfer, we will have to reduce future intakes into the WIA Adult program.
- Training related items needed to attend school (uniforms, immunizations, tools, supplies) will be limited and may be discontinued for WIA Adult participants.
- The 75% transfer waiver will allow the GCWB to provide Employed Worker training.
- For FY 2012 – 2013, the GCWB expended approximately \$370,000 on tuition and books only (does not include training related items); without the 75% waiver this will be reduced to approximately \$300,000 for FY 2013 – 2014 (reduction of 19%).
- For FT 2013 -2014, approximately \$250,000 of WIA Adult will be needed to support Wagner Peyser and the Welfare Transition Program.

North Florida Workforce Development Board (RWB 6)
Request for 75% Transfer Waiver between WIA Dislocated Worker and Adult Program Funds
July 17, 2013

Funding Reductions for RWB 6 include the following:

Funding Category	2013 2014 Allocation	2012 2013 Allocation	Reduction	Percentage
WIA Adult	\$409,550	\$510,086	(\$100,536)	-19.7%
WIA Dislocated Worker	\$246,975	\$298,329	(\$51,354)	-4.2%
WIA Dislocated Supplemental Award	\$52,188	0	\$52,188	
WIA Youth	\$444,778	\$518,021	(\$73,243)	-14.1%
Welfare Transition program	\$338,776	\$429,916	(\$91,140)	-21.2%
Reemployment Assistance Services	\$17,434	\$15,472	\$1,962	12.7%
Wagner Peyser	\$157,364	\$169,835	(\$12,471)	-7.3%
TOTAL:	\$1,667,065	\$1,941,659	(\$274,594)	-14.1%

Factors Related to Need for Transfer Authority:

- Cost Allocation process will require that WIA Adult funds be allocated to cover a larger portion of upfront services to include job search assistance due to reductions in Wagner Peyser and significant reductions in WIA Youth and TANF
- Of the WIA participants served, **only 1 in every 12 participants** who are receiving financial assistance for training is a dislocated worker.
- RWB 6 has done extensive outreach to dislocated worker to increase their participation in retraining services, but has had little to no success in recruiting dislocated workers for retraining services. The same outreach has produced significant increases in WIA Adult training participation (just not dislocated workers).
- The 75% transfer waiver will allow RWB 6 to continue to support WIA Adult participants through ITAs for training services; without the transfer, financial support will be limited to fewer training participants, or greatly reduced support, and will reduce future intakes into the WIA Adult program.
- Training related items needed to attend school (uniforms, immunizations, tools, supplies) are already limited and may be discontinued for WIA Adult participants.
- The 75% transfer waiver will allow RWB 6 to continue support of On-the-Job-Training and Customized Training services to area businesses.
- For FY 2013 -2014, more of the WIA Adult will be needed to support Wagner Peyser and the Welfare Transition Program, as we lost funding in both of those streams.
- RWB 6 is required to ramp up SNAP ET this fiscal year, and it yet to be seen whether adequate funding will be allocated to conduct that program. Uncertainty!

Florida Crown Workforce Board, Inc.
Request for 75% Transfer Waiver between WIA Dislocated Worker and Adult Program Funds

Funding Reductions for Florida Crown Workforce Board, Inc., includes the following

Fund Category	2013-2014 Allocation	2012-2013 Allocation	Reduction	Percentage
WIA PY 2013 Final Allocation	\$ 953,741	\$1,216,112	(\$262,371)	-21.57%
Wagner Peyser PY 2013 Final Allocations	\$ 154,673	\$ 169,002	(\$ 14,329)	-8.48%
WTP 2013-14 Final Allocation	\$ 432,917	\$ 608,379	(\$175,462)	-28.54%
TOTAL	\$1,541,231	\$1,993,493	(\$452,262)	-22.69%

Factors Related to Need for Transfer Authority:

- Cost allocation process will require that WIA Adults funds be allocated to cover a larger portion of upfront services to include job search assistance due to reduction in Wagner Peyser, WIA Youth and significant reduction in TANF funds of 28.54%.
- Of the WIA participants, there is a 4 to 1 (92 to 23) ratio of WIA Adult to Dislocated Worker and a 7 to 1 (22 to 3) waiting list for WIA Adult to Dislocated Worker.
- FCWB have its entire 2012 allocation of WIA Dislocated Worker funds still available for the upcoming year along with its new allocation of 2013-14 allocation.
- FCWB has done extensive outreach to dislocated workers to increase their participation in retraining services, but has had little to no success in recruiting dislocated workers for retraining services. They want to go to work.
- The 75% transfer waiver would allow FCWB to enroll all WIA Adults and Dislocated Worker Participants on our waiting list and would pay allowable ITA cost and also give Participants supportive services to help with their uniforms, immunizations, tools, supplies and testing and licensing cost.
- The 75% transfer waiver will allow FCWB to continue to offer On-the-Job training and Customized training services to area businesses.
- The 75% transfer would allow additional WIA Adult funds to be used to support Wagner Peyser and the Welfare Transition Program cost.

WorkSource
Request for 75% Transfer Waiver between WIA Dislocated Worker and Adult Program Funds
July 1, 2013

Funding Reductions for WorkSource include the following:

Funding Category	2013 2014 Allocation	2012 2013 Allocation	Reduction	Percentage
WIA Adult	\$3,174,808	\$3,416,990	(-\$242,182)	-7.1%
WIA Dislocated Worker	\$4,763,916	\$4,611,951	(+\$151,965)	3.3%
WIA Dislocated Supplemental Award	\$1,014,105	\$1,020,310	(-\$6,205)	-1.0%
WIA Youth	\$3,446,940	\$3,442,775	(-\$4,165)	-0.1%
Welfare Transition program	\$4,676,000	\$5,699,949	(-\$1,023,607)	-18.0%
Wagner Peyser	\$2,275,758	\$2,453,348	(-\$177,590)	-7.2%
TOTAL:	\$19,351,527	\$20,645,323	(-\$1,293,796)	-6.7%

1. Explanation of the need for the additional transfer authority Factors Related to Need for Transfer Authority:

In Region 8 the demand for WIA Adult services far exceeds the demand for WIA Dislocated services. For each person enrolled and served through the Dislocated funding stream, (766 this program year) over 3 times as many applied for and received WIA Adult Services (2408 this program year). Our experience is that those who are qualified to receive dislocated services want to gain employment as soon as possible and choose not to pursue training. This is especially true now that our local labor market has begun to recover. Conversely, we have no challenges finding and serving those customers targeted through the WIA Adult funding stream, i.e. low-income, underemployed, etc. Our strategy has been highly successful; we currently have a 97% completion/credentialing/employment rate of those enrolled in WIA Adult services. Additional transfer authority will mean we can reach and serve additional customers. We are now in an economic recovery; it is critical we have the funds to support local business expansion by supplying qualified workers equipped with in-demand skills.

2. Provide financial documentation to support the requested additional transfer authority (budget, obligations, etc. to demonstrate that more adult funds are needed).

Region 8's WIA Adult Grant for Program Year 2013-2014 is \$ 3,193,761.00. On July 1 we will have obligations amounting to \$2,198,036.00 for currently enrolled WIA Adult trainees and due to complete within the next 12 months. Our cost allocation model requires we charge the WIA Adult funding in the amount of \$3,333,411 to cover leases, salaries, and other related expenses. The difference between funds received and those obligated is negative \$2,337,686. As you will quickly note, without transfer authority and carry forward dollars we would not be able to meet our obligations, continue those already in training nor enroll any additional WIA Adult customers and support the economic recovery.

The following rationale defines our regions request for a waiver to allow a 75% transfer of DW funds to Adult funds:

1. Due to the new law in Florida that requires 50% of WIA funds to be spent on training costs, funds previously spent on core and intensive services for the vast majority of participants that need work first, who are NOT interested in, qualified for or able to enter training have been drastically reduced. In our region, which has 41% of those 25 years of age or above holding bachelors degrees or above, the need for training is not as important as the need for business services, job matching and placement activities. Dislocated Workers are often highly educated. We have been unable to meet our 50% training enrollment through straight dislocated worker training on an individual level for those who are eligible. Being unable to return to their former occupation is the largest obstacle in their eligibility for dislocated worker training. During a time of record highs in Pell Grant funding, we are having to use our WIA funding for, in effect, a pass through to educational institutions to supplement easily available Pell Grant funds, instead of putting people to work that do not need training. If more funds could be transferred to Adult, it would allow us to serve more people in training than we can with Dislocated Worker dollars. We have spent all of our Adult funds this year, but have been unable to spend the Dislocated Worker training dollars due to the lack of eligible Dislocated Worker participants interested in or eligible for training.
2. Additionally, we need to have the flexibility to spend the money for employed workers who are not making self-sufficient wages who need additional training to retain their current employment in their current occupation (thus making them not eligible for dislocated worker funding) or to get upgraded employment in their current occupation/industry. The regional unemployment rate is consistently one of the lowest in the state. Our region suffers from underemployment issues that cannot be remedied through dislocated worker training. Several of our high-skill targeted industries (healthcare, biotechnology, advanced manufacturing, IT) are facing regulatory changes that require skills upgrading of their current workforce. By having the option of providing more employed worker training to workers at risk of losing their jobs we are able to save jobs and create a career ladder and open up entry level positions for less skilled workers.
3. Additional waiver authority also allows our region increased flexibility in enrollment of adults into all funding streams for which they are eligible and allows regional management to make funding decisions based on funds available allowing us to serve the most in need of training within our region. We consistently have to supplement Wagner Peyser and Veterans programs with WIA adult funds in order to cover their overhead and operational activities. Due to the loss of WIA Adult funds to supplement these programs we have had to cut state merit staff in these programs, reducing services to over 30,000 participants in the EFM system needing only core services.



Region 10

Waiver to Increase Transfer Authority Between the WIA Adult and Dislocated Worker Programs

Below is a synopsis of R10's funding reductions:

Funding Category	2013 2014 Allocation	2012 2013 Allocation	Reduction	Percentage
Adult	1,349,575	1,391,789	(42,214)	-3.0%
DW	944,802	1,318,273	(373,471)	-28.3%
YTH	1,246,254	1,279,874	(33,620)	-2.6%
WTP	1,346,356	1,714,448	(368,092)	-21.5%
WP	684,559	745,350	(60,791)	-8.2%
TOTAL	5,571,546	6,449,734	(878,188)	-13.6%

1. Provide a written explanation of the need for the additional transfer authority

A. We do request the waiver for additional transfer authority. We have requested transfers from DW funds to Adult in the past years. Having the flexibility to exceed the 50% would be beneficial. This past year our attempts to bring our expenditures into the 50% requirement resulted in a large number of enrollments into training. Our estimations of obligations that will carry forward into next year show a larger amount of obligations in Adult. In budgeting for next year, we have already budgeted to move 44% of our DW into Adult in order to cover these obligations in Training.

B. After having made these adjustments we have had to discontinue any new enrollments into training and have established a waiting list. We will look at ability to enroll from the waiting list once fall semester enrollments are complete to determine what monies can be released from these obligations.

C. Any monies that can be released or re-programmed will be needed in Adult funds for 3 reasons.

▶ EWT: Due to the high obligations, our available funds for EWT have been strictly limited. We will want to add in more funds to this adult category.

▶ Support Services: Once again obligations in training have forced this category to be severely under budgeted. This category will need to be increased if possible, especially in Adult.

▶ Waiting List: 2/3 of the waiting list is made up of individuals who are likely to be Adult as opposed to DW. (77 DW & 156 Adult) As the economy continues to recover, DW will prefer gaining employment to entering training. This will result in less enrollees into training from DW than from Adult.

The following numbers shows our enrollment into WIA. As you can see there is a huge difference between enrollments from DW to Adult: Current enrollments in training: Adult – 547 DW - 68

2. Provide financial documentation to support the requested additional transfer authority (budget, obligations, etc. to demonstrate that more adult funds are needed).

Projected obligations as July 1 2012 total \$1,560,453 Without the waiver we will be unable to support additional participants through ITAs as our budget somewhat equals our obligations. We had already begun to make plans to transfer funding to adult in order to begin to meet some of these obligations.

Center for Business Excellence
Request for 75% Transfer Waiver between WIA Dislocated Worker and Adult Program Funds
July 1, 2013

Funding Reductions include the following:

Funding Category	2013 2014 Allocation	2012 2013 Allocation	Reduction	Percentage
WIA Adult	\$1,420,393	\$1,545,260	(\$124,867)	-8.1%
WIA Dislocated Worker	\$1,503,782	\$1,698,993	(\$195,211)	-11.5%
WIA Dislocated Supplemental Award	\$ 320,113	\$ 367,490	(\$47,377)	-12.9%
WIA Youth	\$1,530,786	\$1,920,398	(\$389,612)	-20.3%
Welfare Transition program	\$1,821,688	\$2,252,311	(\$430,623)	-19.1%
Reemployment Assistance Services	\$ 119,145	\$ 120,698	\$(1,553)	-1.3%
Wagner Peyser	\$ 928,986	\$ 1,007,430	(\$78,444)	-7.8%
TOTAL:	\$6,715,907	\$8,912,580	(\$1,267,687)	-14.2%

Factors Related to Need for Transfer Authority:

-
- WIA Adult funds will be allocated to cover a larger portion of upfront services due to significant reductions in Wagner Peyser, WIA Youth, Dislocated and TANF.
- Only 20% of WIA clients are receiving financial assistance for training as a dislocated worker.
- There has been little demand for dislocated worker retraining services even though outreach is ongoing.
- The 75% transfer waiver will allow CBE to continue to support WIA Adult participants through ITAs for training services. Without the transfer, financial support will be limited and will reduce future participants in the WIA Adult program.
- Training related items needed to attend school (uniforms, immunizations, tools, supplies) will be limited and transportation and other support services discontinued for WIA Adult participants.
- The 75% transfer waiver will allow CBE to continue to support the demand for On-the-Job-Training and Customized Training services to enhance job seeker and employee skills as well.

Workforce Central Florida
Request for 75% Transfer Waiver between WIA Dislocated Worker and Adult Program Funds
July 1, 2013

Funding Reductions for Workforce Central Florida largest funding sources as follows:

	BUDGET FY 2013/2014	BUDGET FY 2012/2013	DIFFERENCE	%
New Allocation For FY 2013/2014				
Workforce Investment Act (WIA) Adult Funds	\$4,992,088	\$5,184,153	(\$192,065)	-3.7%
Workforce Investment Act (WIA) Youth Funds	\$5,163,776	\$5,509,188	(\$345,412)	-6.3%
Workforce Investment Act (WIA) Dislocated Worker Funds	\$6,745,157	\$8,578,292	(\$1,833,135)	-21.4%
Welfare Transition Funds (WTP)	\$6,322,777	\$7,093,719	(\$770,942)	-10.9%
Wagner Peyser Funds	\$2,678,055	\$2,938,915	(\$260,860)	-8.9%
TOTAL	\$25,901,853	\$29,304,267	-\$3,402,414	-11.6%

Based on the funding reductions noted above, WCF is requesting a waiver to increase transfer authority between the WIA Adult and Dislocated Worker Programs. Justification for this request is as follows:

- For fiscal year 2013-14, WCF has budgeted \$2.3M in Work Experience activities and \$6M in ITA's for training services. Despite extensive outreach to WIA Dislocated Workers, the majority of participants served are WIA Adult customers. The 75% transfer waiver will provide greater flexibility and allow WCF to continue to provide WIA training services during the new fiscal year.
- WCF has budgeted roughly \$1.5M dollars in pre-vocational training, customized training, and On-The-Job Training for fiscal year 2013-14. The 75% transfer waiver will allow WCF to reach these goals.
- Support services for the new fiscal year have been budgeted at \$820K. Due to the budget cuts in the Welfare Transition Program, WIA Adult funding will be needed to support this customer assistance program.
- Funding decisions throughout the new fiscal year will be necessary to allocate overhead expenditures to WIA Adult to cover for funding cuts of nearly \$1M between Welfare Transition and Wagner Peyser programs.

Brevard Workforce – RWB 13
Request for 75% Transfer Waiver between 2013-2014 WIA Dislocated Worker and Adult Funds

Funding Reductions for Brevard Workforce include the following:

Funding Category	2013 2014 Allocation	2012 2013 Allocation	Reduction	Percentage
WIA Adult	\$1,207,671	\$1,271,826	(\$64,155)	-5.0%
WIA Dislocated Worker	\$1,628,562	\$2,407,327	(\$778,765)	-32.3%
WIA Dislocated Supplemental Award	\$ 346,675	\$ 532,577	(\$185,902)	-34.9%
WIA Youth	\$1,065,988	\$1,280,163	(\$214,175)	-16.7%
Welfare Transition program	\$1,082,835	\$1,371,794	(\$288,959)	-21.1%
Reemployment Assistance Services	\$ 234,568	\$ 216,504	\$ 18,064	8.3%
Wagner Peyser	\$ 866,785	\$ 932,613	(\$65,828)	-7.1%
TOTAL:	\$6,433,084	\$8,012,804	(\$1,579,720)	-19.7%

Factors Related to Need for Transfer Authority:

- Our cost allocation process will require that WIA Adult funds be allocated to cover a much larger portion of upfront services, including job search assistance, due to reductions in Wagner Peyser and significant reductions in Welfare Transition and WIA Youth. In FY 2013-2014, approximately \$850,000 of WIA Adult funding will be needed to support the shortfalls in these other programs.
- Brevard has done extensive outreach to dislocated workers to increase their participation in retraining services, but has had little success in recruiting them for retraining services.
- The 75% transfer waiver will allow us to continue supporting WIA Adult customers through ITAs for training services; without this transfer, future intakes into the WIA Adult program will be significantly reduced. In FY 2012-2013, Brevard expended approximately \$1.3 million on ITAs, however without a 75% waiver for FY 2013-2014, ITA spending will be reduced to approximately \$900,000 (a 30% reduction).
- Training related items needed to attend school (uniforms, immunizations, tools, supplies) will be limited and may be discontinued for our WIA Adult customers.
- The 75% transfer waiver will allow Brevard to continue to support On-the-Job-Training and Customized Training services for area businesses.

**Polk County Workforce Development Board Inc. dba Polk Works, Inc.
Request for 75% Transfer Waiver between WIA Dislocated Worker and Adult
Program Funds
July 15, 2013**

Funding Reductions for Polk County Workforce Development Board Inc. dba Polk Works, Inc., include the following:

Funding Category	2013 2014 Allocation	2012 2013 Allocation	Reduction	Percentage
WIA Adult	\$1,545,791	\$1,581,704	(\$35,913)	-2.27%
WIA Dislocated Worker	\$1,434,971	\$2,430,001	(\$995,030)	-40.95%
WIA Dislocated Supplemental Award	\$ 305,465	\$ 232,245	73,220	31.53%
WIA Youth	\$ 1,565,883	\$1,841,927	(\$276,044)	-14.99%
Welfare Transition program	\$ 2,188,372	\$2,703,666	(\$515,294)	-19.06%
Reemployment Assistance Services	\$ 176,076	\$ 167,540	\$8,536	5.09%
Wagner Peyser	\$ 895,598	\$ 971,273	(\$75,675)	-7.79%

Factors Related to Need for Transfer Authority:

- Waiver authority allows our region increased flexibility in enrollment of adults into all funding streams for which they are eligible and allows regional management to make funding decisions based on funds available allowing us to serve our region training needs.
- Polk Works has done extensive outreach to dislocated workers to increase their participation in retraining services, but has had little to no success in recruiting dislocated workers for retraining services.
- Of the WIA participants served, only 1 in every 3 participants who are receiving financial assistance for training is a dislocated worker.
- The 75% transfer waiver will allow Polk Works to continue to support WIA Adult participants through ITAs for training services; without the transfer, financial support will be limited and future intakes into the WIA Adult program will be reduced.
- Training related items needed to attend school (uniforms, immunizations, tools, supplies) will be limited.
- The 75% transfer waiver will allow Polk Works to continue to support On-the-Job-Training and Customized Training services to area businesses.

1. Provide a written explanation of the need for the additional transfer authority; and,

Additional transfer authority is requested to increase the percentage of funding that can be transferred between the Adult and Dislocated Worker funding streams from the currently approved 50% to 75%. The need for additional transfer authority is based on improving regional economic conditions resulting in a declining unemployment rate, layoffs, and terminations. In the past year alone, regional unemployment dropped 8.5% to 6.8%. A decreasing regional unemployment rate with fewer layoffs and terminations leads to a declining population of dislocated workers. A continued decline in the dislocated worker population supports the need for additional transfer authority for Adult and Dislocated Worker funding streams.

2. Provide financial documentation to support the requested additional transfer authority (budget, obligations, etc. to demonstrate that more adult funds are needed).

Suncoast Workforce is a direct service provider. At this time we have not begun to obligate funds for PY 13-14. We do have a budget approved by our Board that includes transferring \$883,915 from our Dislocated Worker funds to Adult funds to cover anticipated expenses for PY 13-14. This would maximize our PY 12 DW NFA's 50% limit. For PY 13 DW NFA after the above transfer we would only have available to transfer \$181,840 for the next two years. 1st document attached from our budget packet is a worksheet that summarizes our funds available, transfers, less reserve for PY 14-15, and then the funding budgeted for PY 13-14 by funding stream. The 2nd document attached from our budget packet is an allocated budget for PY 13-14 by funding stream. Our line item for DW client training includes \$204,863 in OJTs. We would like to move this amount to adult OJTs. To do this would require the 50% limit to be increased. Currently our caseloads are running about 64% adult (309) and 36% DW (172).

Heartland Workforce – RWB 19

Request for 75% WIA Adult/Dislocated Worker Transfer Waiver Authority – FY 13/14

Current revenue projections indicate a 16% decrease in available funds. The table below shows the comparative base funding – Program Year 2012 to Program Year 2013.

Program	PY 12 Allocation	PY 13 Allocation	Difference	As a %
WIA Adult	\$580,400	\$496,702	(\$83,698)	-14%
WIA Dislocated Worker	\$406,071	\$389,639	(\$16,432)	-4%
WIA Youth	\$726,186	\$577,847	(\$148,339)	-20%
TANF	\$470,069	\$365,983	(\$104,086)	-22%
Wagner-Peyser	\$240,536	\$217,208	(\$23,328)	-10%
Totals	\$2,432,262	\$2,047,379	(\$375,883)	-16%

Justification:

- WIA Adult funds will absorb a greater proportionate share of allocated costs as a result of reduced TANF, WIA Youth and Wagner-Peyser funding. It is important to note that Wagner-Peyser pass-thru funds have historically funded at a level which does not promote a self-supporting program which results in the WIA Adult program absorbing Wagner-Peyser core services costs.
- WIA Adult/Dislocated Worker statistics indicate that only 16% of training participants served qualify as Dislocated Workers while 84% are Adult.
- The 75% waiver would provide continued ITA training opportunities for Adult participants which might otherwise revert to a priority of service limitation on enrollment.
- Without the transfer authority, training opportunities such as OJT, EWT and Customized Training for employers would be limited or eliminated.

Workforce Alliance, Inc. (RWB21)
Request for 75% Transfer Waiver between WIA Dislocated Worker and Adult Program Funds
July 3, 2013

Funding Reductions for Workforce Alliance Inc., include the following:

Funding Category	2013 2014 Allocation	2012 2013 Allocation	Reduction	Percentage
WIA Adult	\$2,965,199	\$3,568,908	(\$603,709)	-16.92%
WIA Dislocated Worker	\$3,504,089	\$3,643,109	(\$139,020)	-3.82%
WIA Youth	\$2,915,435	\$3,507,818	(\$592,383)	-16.89%
Welfare Transition program	\$2,292,437	\$3,123,575	(\$831,138)	-26.61%
Wagner Peyser	\$2,017,565	\$2,138,982	(\$121,417)	-5.68%
TOTAL:	\$13,694,725	\$15,982,392	(\$2,287,667)	-14.31%

Factors Related to Need for Transfer Authority:

- WIA Adult funding has decreased \$603,792 as compared with WIA Dislocated, which has decreased by \$139,020. To date, our open encumbrances for WIA Adult are \$1,178,000 compared to \$524,000 for WIA Dislocated participants.
- For PY 2012-2013, \$550,000 of the WIA Dislocated funds were spent on Incumbent Worker Training, which we don't plan to continue in the PY 2013-2014. With the reduced funding, we are focusing on providing Individual Training Accounts and On the Job Training to participants.
- Workforce Alliance's need for WIA Adult funds exceeds that of WIA Dislocated, yet our funding allocation for Adult is significantly below that of WIA Dislocated.
- Cost Allocation process will require that WIA Adult funds be allocated to cover a larger portion of upfront services to include job search assistance due to significant reductions in WIA Youth and TANF
- Dislocated WIA funds are far more restrictive than WIA adult. Increasing the maximum inter transfer amount would allow the Region to use the funds in a manner that is more efficient and effective.