



JUN 15 2012

The Honorable C.L. "Butch" Otter
Governor of Idaho
700 West Jefferson
Second Floor
Boise, Idaho 83702

Dear Governor Otter:

This letter provides approval of an extension of Idaho's current Workforce Investment Act (WIA) and Wagner-Peyser Act (W-P) State Plan for a portion of Program Year (PY) 2012. This letter also provides approval of extensions for Idaho's current waivers. Training and Employment Guidance Letter (TEGL) No. 21-11, issued on March 27, 2012, provides guidance for states to secure approval of their WIA/W-P State Plans and waivers for PY 2012. In accordance with TEGL No. 21-11 and your extension request, the State must submit a full five-year WIA/W-P State Plan and annual W-P Agricultural Outreach Plan by September 15, 2012.

Extension of State Plan

Idaho's existing State Plan will expire on June 30, 2012. This letter constitutes a written determination under WIA Section 112 (29 USC 2822) that the Employment and Training Administration (ETA) is temporarily extending the approval of Idaho's State Plan for WIA Title I and the Wagner-Peyser Act into PY 2012, for the period July 1, 2012 through December 31, 2012. The State already received its formula allotment for the WIA Youth program for PY 2012. The State is eligible to receive WIA formula allotments for the Adult and Dislocated Worker programs under the PY 2012 Annual Funding Agreement. The W-P Annual Funding Agreement on PY 2012/Fiscal Year 2013 will provide the W-P Act initial base allocation of PY 2012 funds.

Performance Levels

Idaho requested to temporarily extend its existing PY 2011 WIA and W-P performance goals for a portion of PY 2012. ETA has incorporated these performance goals, identified as PY 2012 performance goals, into the Regional and National Office copies of the State Plan. Please include these PY 2012 goals in the State's official copy of the State Plan. As required by TEGL 21-11, the state must renegotiate its new PY 2012 goals upon submission of its full State Plan.

Waivers

As part of the State's extension of the WIA/W-P Act State Plan, and as described in TEGL No. 21-11, the State requested temporary extensions of Idaho's PY 2011 waivers of statutory and regulatory requirements under WIA for PY 2012. The disposition of the State's waiver extensions is outlined below. This action is taken under the Secretary's authority at WIA Section 189(i) to waive certain requirements of WIA Title I, Subtitles B and E, and Sections 8-10 of the Wagner-Peyser Act.

Waiver to permit the State to replace the performance measures at WIA Section 136(b) with the common measures.

The State was previously granted a waiver that allows the State to replace the 17 performance measures under WIA Section 136(b) with the common measures. The State is granted an extension of this waiver through December 31, 2012.

This waiver permits the State to negotiate and report WIA outcomes against the common performance measures only, rather than the performance measures described at WIA Section 136(b). The State will no longer negotiate and report to ETA on the following WIA measures: WIA adult and dislocated worker credential rates; participant and employer customer satisfaction; older youth measures; and younger youth measures. The State will use the three adult common performance measures to negotiate goals and report outcomes for the WIA Adult and WIA Dislocated Worker programs. The State will use the three youth common performance measures to negotiate goals and report outcomes for the WIA Youth program. Workforce Investment Act Standardized Record Data system (WIASRD) item 619, Type of Recognized Credential, should be completed for each individual as appropriate, regardless of this waiver to report on common performance measure outcomes only.

Waiver of WIA Section 123 that requires that providers of Youth program elements be selected on a competitive basis.

The State was previously granted a waiver of the requirement for competitive procurement of service providers for three of the ten youth program elements: supportive services, follow-up services, and work experience. The State is granted an extension of this waiver through December 31, 2012. Under this waiver, the State is permitted to allow its One-Stop Career Centers or partner agencies to directly provide the above youth program elements. In utilizing this waiver, the State and local areas must still meet Office of Management and Budget requirements (codified in 29 CFR 95.40-95.48 and 97.36) and all state and local procurement laws and policies.

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

The State was previously granted a waiver of the time limit on the period of initial eligibility of training providers provided at 20 CFR 663.530. The State is granted an extension of this waiver through December 31, 2012. Under the waiver, the State is allowed to postpone the determination of subsequent eligibility of training providers. The waiver also allows the State to provide an opportunity for training providers to re-enroll and be considered enrolled as initially eligible providers.

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

The State was previously 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 is granted an extension of this waiver through December 31, 2012. Under the waiver, the following reimbursement amounts will be permitted: 1) up to 90 percent for employers with 50 or fewer employees, and 2) up to 75 percent for employers with 51-250 employees. For employers with more than 250 employees, the current statutory requirements (50 percent reimbursement) will continue to apply. When determining the funding source for on-the-job training, the State must use the appropriate program funds for the appropriate WIA-eligible population. The State and local area may provide on-the-job training to individuals over age 18 with WIA Adult funds and must provide priority to low-income individuals when funds are limited; the State and local area may provide on-the-job training to dislocated workers with WIA Dislocated Worker funds. On-the-job training provided with statewide funds must serve WIA eligible individuals.

Waiver of WIA regulations at 20 CFR 661.300(f) to allow the State Board to carry out the roles of a Local Board.

The State was previously granted a waiver to permit the state to apply 20 CFR 661.300(f) to the statewide regional planning area described in its State Plan. 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. The State is seeking to continue to use its State Board to carry out the roles and responsibilities of the Local Boards in the designated region encompassing the state.

We are granting the waiver through December 31, 2012. Under the waiver, the Governor may designate the State Board to carry out the roles and responsibilities of the Local Boards in the designated region encompassing the state, in the same manner as permitted in single service delivery area states.

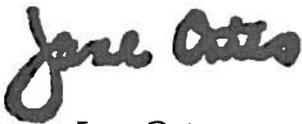
Waiver of the prohibition at 20 CFR 664.510 on the use of Individual Training Accounts for older and out-of-school youth.

The State was previously granted a waiver of the prohibition at 20 CFR 664.510 on the use of Individual Training Accounts (ITAs) for older youth and out-of-school youth program participants. The State is granted an extension of this waiver through December 31, 2012. Under this waiver, the State can use ITAs for older youth and out-of-school youth program participants. The State must continue to make the 10 youth program elements available as described at WIA Section 129(c)(2). The State should ensure that funds used for ITAs are tracked and that the ITAs are reflected in the individual service strategies for these youth.

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 described in TEGL No. 29-11, the State should address the impact that 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 receiving your full State Plan for PY 2012 and working together as you implement your State workforce strategies. If you have any questions related to the issues discussed above, please contact Denise Dombek the Federal Project Officer for Idaho, at 415-625-7945 or Dombek.Denise@dol.gov.

Sincerely,



Jane Oates
Assistant Secretary

Enclosure

cc: Todd Yamamoto, Acting Regional Administrator, ETA San Francisco Regional Office
Denise Dombek, Federal Project Officer for Idaho

IDAHO

DEPARTMENT OF LABOR

C.L. "BUTCH" OTTER, GOVERNOR
ROGER B. MADSEN, DIRECTOR

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](mailto:YamamotoTodd@dol.gov) and WIA.PLAN@dol.gov

RE: PY2012 Idaho WIAW-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)(i) 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,

Roger B. Madsen

Roger B. Madsen
Director