

WIOA State Plan 2019 State Waiver Request

The State of Georgia

The Technical College System of Georgia's Office of Workforce Development (OWD), on behalf of the State of Georgia, is seeking a waiver in accordance with the Workforce Innovation and Opportunity Act (WIOA) at Section 129(a)(4)(A) and 20 Code of Federal Regulation (CFR) 681.410. Under WIOA Section 129(a)(4)(A) and 20 CFR 681.410, for any program year, not less than 75 percent of the funds allotted under Section 127(b)(1)(C), reserved under Section 128(a), and available for statewide activities under subsection (b), and not less than 75 percent of funds available to local areas under subsection (c), shall be used to provide youth workforce investment activities for out-of-school youth.

Georgia is requesting the following waiver to this statutory and regulatory provision:

A waiver of the requirement to expend at least 75 percent of funding on the Out-of-School (OSY) population be lowered to 50 percent for both statewide and local activities.

While OWD recognizes the value and importance of WIOA's heightened emphasis on the alignment of programs that serve out-of-school youth in order to ensure they obtain the skills necessary to prepare for educational achievement and workforce participation, it creates an undue burden for our Local Workforce Development Areas (LWDAs). This is especially burdensome when:

1. ISY Work Experience programming is limited as a result of the 75% rule for OSY funds.

LWDAs in Georgia have a successful track record of providing notable Work Experience programs for ISY; however, many of these same areas are now only able to provide summer Work Experience for the youth in their service delivery areas, and for some even those programs have received cuts due to decreased funding. This means that fewer ISY are given the opportunity to participate in programs that will ensure youth enter the workforce with an expanded level of employability and soft skills that are necessary to secure entry level jobs and beyond. Communities have grown to rely on these resources and are disappointed that very successful programming is no longer available to their ISY.

2. Limited ISY funding creates restrictions for the expansion of Pre-Apprenticeship programs.

Georgia is currently the recipient of the American Apprenticeship Initiative (AAI) Grant. Through the implementation of this grant, the state has greatly expanded Registered Apprenticeship resources for employers and their prospective workforce. Although the state is interested in expanding Pre-Apprenticeship resources, LWDAs have been hesitant due to the lack of ISY funding. As a result, ISY are not given the opportunity to participate in Pre-Apprenticeships, and the state is unable to provide the full breadth of apprenticeship opportunities to its citizens. Pre-Apprenticeship programs can provide basic skills, integrated instructional models, and other activities designed to prepare youth with the skills needed to enter into a Registered Apprenticeship.

3. Due to the constraints in ISY funding, many high poverty counties no longer operate year-round in-school programs, or if provided, limit programming to rising seniors with restricted services.

The federal requirement is creating a hardship for many LWDAs, resulting in terminated or limited services offered or provided to ISY under WIOA guidelines. This eliminates opportunities for early

intervention for youth in danger of dropping out and leads to at-risk youth becoming disconnected from an education system.

This request is submitted in accordance with the Secretary's waiver authority outlined in Section 189(i)(3)(B) of WIOA and 20 CFR 679.600 thru 679.640. This waiver request will assist Georgia to further develop its workforce while continuing to focus on innovative strategies for a demand-driven workforce.

Actions to Remove Barriers:

There is currently no state or local statutory or regulatory barriers to implementing the requested waiver. The State of Georgia's regulations and policy statements are in compliance with current federal law.

Strategic Goals of Requested Waiver:

1. Expand already successful Work Experience programs to additional ISY.
2. Expand youth opportunities to include Pre-Apprenticeship programs, which serve as a stepping stone to prepare youth for entry into a Registered Apprenticeship. Registered Apprenticeships are an effective strategy for engaging employers, pipelining job seekers into high demand fields, and increasing the skills and earnings of those employees.
3. Increase services to at-risk and disadvantaged youth currently attending a school (as defined by State Law). Increasing the percent of funding allocated to ISY will assist in increasing secondary education attainment and workforce readiness among low-income youth.

Programmatic Outcomes from Implementation of the Waiver:

1. Approval of this waiver will allow Georgia's LWDA's to strategically focus their allocated funds on an approach to better serve at-risk youth while discouraging a disconnection from education institutions. When teens are exposed to work through summer and year-round employment, internships, and service opportunities, they are far more likely to stay in school, graduate on time, and be consistently employed as adults. Specifically, among other programmatic activities, this waiver would allow LWDA's to fund a greater number of summer work experience activities targeting eligible at-risk in-school youth. This program design will include a combination of summer credit recovery in conjunction with summer work experience. We expect to also see a continued increase in graduation rates because of expanding opportunities that keep students invested in their education. This structure is in high demand and has proven effective in keeping youth engaged in positive activities when school is not in session. An opportunity is created to enhance the individual student experience through stronger partnerships with the school system and supportive services.
2. Approval of this waiver will allow the State of Georgia and LWDA's to better utilize WIOA to support Pre-Apprenticeship strategies, programs, and participants. Therefore, increasing the amount of youth with skill gains for employability. The expansion of Pre-Apprenticeship programs will directly lead to a strengthening of the associated Registered Apprenticeship programs as well.
3. Approval of this waiver will provide support for ISY while equipping them with academic and technical skills necessary to improve their employability. The expansion of ISY programs will increase the opportunity for youth to finish high school and continue on a pathway into a career or post-

secondary education. In addition, employers will have a stronger talent pipeline reducing their training costs and employee turnover.

Individuals, Groups, or Populations impacted by the Waiver:

The decreased requirement in out-of-school expenditure to 50% will significantly affect multiple populations of the public workforce system, including, but not limited to:

1. Georgia's at-risk and disadvantaged youth population and their families
2. Local Workforce Development Areas
3. American Job Centers and subcontracted service providers staff
4. Local employers
5. Georgia Department of Education
6. Technical College System of Georgia's Office of Workforce Development

Monitoring Waiver Implementation:

Annual WIOA on-site programmatic reviews will include an evaluation of the impact of the waiver on local programs to ensure programmatic goals and outcomes are being met.

OWD's Youth Services Lead, dedicated to the administration of the WIOA Youth programs, will continually examine the effectiveness of the waiver throughout the program year. This strategy ensures that the goals described above, as well as those outlined in the existing state and local WIOA plans, are consistent with the established objectives of WIOA, and federal and state regulations.

Notice to Local Boards and Public Comment:

Concurrent with the submission of this waiver request, the State will notify all 19 Local Workforce Development Board Directors of the state's intent of this request. Upon approval of the waiver, OWD will issue a Policy Statement notifying all local Workforce Development Boards that this change will be implemented effective immediately.

Local Workforce Development Boards will be provided a copy of this waiver request and given the opportunity to contact OWD prior to submission of the State's Unified WIOA Plan modification to discuss and have input on the waiver request. All local boards will also have access to the draft Unified Plan and an opportunity to comment during the public review and comment period.

This waiver request will be included in the Unified Plan Submission and subject to public comment within the Plan guidelines and the WIOA requirements outlined in WIOA regulations at 20 CFR 676.130(d).

Georgia will collect and report information about waiver outcomes in the State's WIOA Annual Report.