

Workforce Innovation and Opportunity Act

Idaho State Plan: Title IB Adult, Dislocated Worker and Youth Programs for the State of Idaho

The Combined State Plan includes the following with respect to activities carried out under subtitle B--

(a.) General Requirements

(1). Regions and Local Workforce Development Areas

(A). Identify the regions and the local workforce development areas designated in the State.

Idaho is identified as a single statewide planning region, consisting of the two former WIA local areas –

1. Balance of State and
2. East-Central District.

(B). Describe the process used for designating local areas, including procedures for determining whether the local area met the criteria for “performed successfully” and “sustained fiscal integrity” in accordance with 106(b)(2) and (3) of WIOA. Describe the process used for identifying regions and planning regions under section 106(a) of WIOA. This must include a description of how the State consulted with the local boards and chief elected officials in identifying the regions.

Draft policy criteria for local area designation and appointment of local board members were posted and presented to the Workforce Development Council at the July 2015 public meeting in Idaho Falls. The criteria were modified and approved by the Governor and then posted for public comment on the Idaho Department of Labor website for 30 days from August through early September 2015. Local public officials were notified via the Idaho Association of Cities to ensure that all Idaho mayors and county clerks received direct notice of the policies and opportunity to comment. *No comments were received.*

At the October 19, 2015 public meeting, the Workforce Development Council adopted the WIOA local area designation policy and policy for appointment of local board members. Both local areas met the policy criteria for “performed successfully” and “sustained fiscal integrity” as described below.

Performed Successfully - Met or exceeded the negotiated levels of performance for the last two consecutive program years.

Sustained Fiscal Integrity - The Secretary of Labor has not made a formal determination that either the grant recipient or the administrative entity of the area misexpended funds due to willful disregard of the requirements of the provision involved, gross negligence, or failure to comply with accepted standards of administration for the two-year period preceding the determination

After the initial designation of the local areas, a policy for identification of region(s) was developed. Again, the policy was posted for public comment on the Idaho Department of Labor website for a minimum of 30 days December 2015 through January 2016 and the Idaho Association of Cities was informed to ensure that all Idaho mayors and county clerks received direct notice of the policy and opportunity to comment. *No comments were received.*

Local Area Designation and Policy -
<https://www.labor.idaho.gov/wia1/meetings/101915/Tran7.doc>

Region Identification and Policy -
<https://www.labor.idaho.gov/wia1/meetings/011316/Tran5.pdf>

(C). Provide the appeals process referred to in section 106(b)(5) of WIOA relating to designation of local areas.

Denial of Local Area Designation

A unit of general local government that requests but is not granted designation as a local Workforce Investment area under section 106 (b) (2) or (3) may submit an appeal to the State Workforce Development Council.

All such appeals shall be in writing and be filed within twenty (20) calendar days of the date the denial letter was mailed by the Governor or the Governor's designee. The appeal must include all factual and legal arguments as to why the appeal should be granted. The appeal shall be filed with the Chair of the Governor's Workforce Development Council, C/O WDC Executive Director, 317 West Main Street, Boise, Idaho 83735. The executive director of the Council, or the Chair's designee, shall promptly acknowledge receipt of the appeal.

The existing designated workforce areas will continue while the appeal is in progress and will be modified should the initial denial of designation be overturned.

(i) Appeal to the State Workforce Development Council

The appeal shall be deemed timely filed if the Chair of the Workforce Development Council receives it within the 20-day period, unless the appeal is filed by mail, in which case the official postmark affixed by the U.S. Postal Service shall be deemed the date of filing. Any appeal filed late shall be summarily dismissed.

The Chair of the Council will select a hearing officer. The hearing officer shall hear the appeal not more than thirty-days (30) after the appeal was filed. With the consent of the appealing party, the hearing may be held after the thirty-day period, but in no case shall the hearing be conducted more than sixty-days (60) after the appeal was filed.

The hearing officer shall inform the appellant of the date, time and place of the hearing by written notice mailed at least ten-calendar days (10) in advance. The appellant shall have the right to present testimony and documentary evidence, to offer evidence in rebuttal, to present oral argument and to be represented by legal counsel. All testimony received by the hearing officer shall be under oath or affirmation. If the appellant retains legal counsel, federal WIOA funds cannot be used for remuneration.

An appellant must establish that it is entitled to designation as a local area according to this policy.

Within fifteen (15) days of the hearing, the hearing officer shall issue a recommended decision, which shall include findings of fact, recommendations and the basis therefore. That decision shall be mailed to the appealing party. The hearing officer shall file a copy of the recommended decision with the Chair of the Council.

The hearing officer's recommended decision shall be placed on the agenda of the next Council meeting for disposition. However, if the Council has no meeting scheduled within forty-five (45) days of the decision date's issuance, a special meeting of the Council, or a Committee designated by the Chair, shall be conducted within that 45-day period to accept, reject or modify the hearing officer's recommended decision.

In its deliberations, the Council shall consider only the evidence presented to the hearing officer. The Council shall not receive or consider any evidence not presented to the hearing officer. The decision of the Council shall be reduced to writing and be mailed to the Governor and the appealing party. The decision must set out in summary fashion the Council's findings and conclusions. The Council may adopt, in whole or in part, the findings of fact, recommendations and rationale of the hearing officer.

(ii) Appeal to USDOL

If a timely appeal of the decision does not result in the requested designation, the unit of general local government or grant recipient may further appeal the designation decision to the U.S. Secretary of Labor within thirty-days (30) after receipt of the Council's written decision. The appeal to the Secretary must be consistent with the requirements of the Workforce Innovation and Opportunity Act. The Secretary, after receiving a request for review and upon determining that the entity has met the burden of establishing that it was not accorded procedural rights under the appeal process established in the state plan, or that the area meets the requirements of Section 106(b) paragraph (2) or (3) and 20 CFR 679.250, as appropriate, may require that the area be designated as a local area. As part of this determination, the Secretary may consider comments submitted by the Council in response to the appeal.

Appeals made to the Secretary must be filed no later than 30 days after receipt of written notification of the denial from the Council, and must be submitted by certified mail, return receipt requested, to:

Secretary U.S. Department of Labor Attention: ASET
200 Constitution Ave NW,
Washington, DC 20210,

A copy of the appeal must also be simultaneously provided to the State Council, submitted to:

Workforce Development Council
C/O Executive Director
317 West Main Street
Boise, Idaho 83735

The Secretary will notify the Governor and the appellant in writing of the Secretary's decision within 45 days after receipt of the appeal. In making this determination, the Secretary may consider any comments submitted by the Governor in response to the appeals.

(D). Provide the appeals process referred to in section 121(h)(2)(E) of WIOA relating to determinations for infrastructure funding.

A one-stop partner may appeal its portion of funds required for one-stop infrastructure costs after determination by the Governor under the State infrastructure funding mechanism, consistent with §361.705(b).

The appeal must be made in writing to the Idaho Workforce Development Council within ten (10) business days of the Governor's determination. The appeal will be heard at the next Workforce Development Council meeting, provided there are at least 14 days before the next meeting. If the Council's regularly scheduled meeting is sooner than 14 days from the appeal submission, a special meeting of the Council, or a Committee designated by the Chair, shall be conducted within a 30-day period to accept or reject the appeal. The partner program entity shall have the opportunity to submit written and verbal information to the Workforce Development Council. The Council will issue a decision within 14 days of the Council appeal hearing. Its decision will be final.

Each partner may only appeal once per program year.

(2). Statewide Activities

(A). Provide State policies or guidance for the statewide workforce development system and for use of State funds for workforce investment activities.

The Idaho Workforce Development Council, functioning as both Idaho's State and Local board, continually updates statewide policy to for use by all WIOA service providers. All

statewide policies for Governance, WIOA Title IB, and One-Stop System reside on the Council's website:

<https://www.labor.idaho.gov/dnn/WIOA/Law-and-Policies>

The general statewide service policies are provided below and linked here:

<https://www.labor.idaho.gov/wioa1/policies/Statewide-Service.pdf>.

Statewide Service Policies for WIOA Title IB Service Provision

(i) Residency

WIOA adult, youth and dislocated worker career and training services will be limited to residents of the state of Idaho. Residents of other states who wish to receive WIOA career and training services will first be referred to the One Stop/American Job Center in their home state to obtain resources for services. First priority will be given to Idaho residents who are eligible for career and training services. In instances where a home state denies services to an out-of-state resident, the Idaho One Stop/American Job Center may consider enrollment of the individual if it is in the best interest of the state of Idaho and no qualifying Idaho residents are denied access to services as a result.

(ii) Priority

In the provision of WIOA services, veterans' priority will be followed in accordance with 38 USC Chapter 41, 20 CFR 1001.100 and PL 107-288. Priority will also be given to low-income individuals with barriers to employment. Additionally, priority for individualized and training services in the adult program will be provided to individuals who are basic skills deficient, which may include referral to Title II programs.

(iii) Participant follow-up

The Workforce Innovation and Opportunity Act requires that Title I Youth, Adult and Dislocated Worker participants receive follow-up services for not less than 12 months. For the duration of the 12-month follow-up period, a minimum of one contact with each exiter who received career or training services from a WIOA program (adult, dislocated worker or youth) is required per quarter. Appropriate supportive services are allowable for youth during the follow-up period.

(iv) Work Experience Activity

The participation hours for this activity are limited to ensure participants are engaged in learning basic work maturity skills such as attendance, following directions and wearing appropriate attire as opposed to receiving occupational skill training. Work Experience activities take place in a public, private for-profit or non-profit workplace for a limited period, generally not exceeding 520 hours. All participants enrolled in the Work Experience activity are to receive an hourly

wage equivalent to the state or federal minimum wage, whichever is higher. Participants are provided with Federal Insurance Contributions Act (FICA) and workers compensation coverage while participating in this activity.

(v) Internship Activity

All participants enrolled in the Internship activity are to receive an hourly wage at least equivalent to the state or federal minimum wage, whichever is higher. The wage may be higher depending on the participant's prior training/work experience and the hourly wage offered at the worksite to individuals with comparable training/work experience. (250-hour limitation)

(vi) Out of Area Job Search Activity Limitations

This service is designed to assist adults and dislocated workers in seeking employment in areas outside of their normal commuting distance. Career planners may authorize multiple job searches for a single client.

Out of Area Job Search - Each out of area job search is limited to 90 percent of allowable and actual costs up to \$600.

Out of Area Job Search Cash Advance - A job search cash advance is limited to 50 percent of estimated costs not to exceed \$300.

(vii) Relocation Assistance Activity Limitations

Relocation assistance is designed to enable participants to receive financial assistance toward the cost of relocating themselves and their family to a labor market outside of their normal commuting distance.

Relocation - Relocation assistance is limited to 90 percent of allowable and actual costs not to exceed \$4,000.

Relocation Cash Advance - A cash advance for relocation is limited to 50 percent of the estimated costs for the trip, or \$750, whichever is lower.

(vii) Individual Training Account (ITA)

The ITA is established on behalf of an adult, dislocated worker or youth participant when purchasing any occupational training services (tuition and books), from an eligible training provider selected in consultation with the career planner from the State-maintained WIOA Eligible Training Provider list. No monetary limitations on ITAs as staff will ensure that each ITA cost is reasonable and necessary. Career planners will continue to adhere to the WIOA requirement to document coordination of financial assistance with training providers, including Free Application for Federal Student Aid (FAFSA) and scholarships where applicable. The Workforce Development Council will be updating its ETP policy to include further direction on ITAs in PY2020.

(ix) Needs-Related Payments

Needs-related payments are payments that are necessary to enable an individual to participate in training services for adults and dislocated workers. However, because of limited WIOA funding, the needs-related payment option has been eliminated.

(x) Incentives and Bonuses

A stand-alone youth policy since 7/13/2017 -

<https://www.labor.idaho.gov/wioa1/policies/youth-program-incentives.pdf>

The Workforce Development Council will be reviewing this policy and updating it in PY2020 if needed.

(xi) Policy on Self-sufficiency

An employed adult shall be considered self-sufficient if the family income exceeds 155 percent of the U.S. Department of Labor's Lower Living Standard Income Level (LLSIL) guidelines. A reemployed dislocated worker shall be considered self-sufficient if he/she is employed in a permanent position that pays at least 90 percent of the qualifying layoff wage.

(xii) Dislocated Worker Eligibility

(aa) Timeline

Three years will be established as the timeframe from which the layoff, termination or ending of self-employment occurred for dislocated worker eligibility purposes.

(bb) Unlikely to Return

Four weeks of unemployed time shall be used to substantiate "unlikely to return" to the previous industry or occupation. The four weeks of unemployed time can be waived if the career planner can verify/document that the registrant is unlikely to return to a previous industry or occupation.

(cc) Duration Sufficient to Demonstrate Attachment to the Workforce

Applicants must provide evidence that they have been employed full-time (30 hours or more per week) in the same or similar occupation for at least one year out of the last three years immediately prior to registration, or they must otherwise demonstrate that they have had substantial attachment to the same or similar occupation for at least one year. The term "substantial" is based on calculating the fulltime equivalency of work history. "Fulltime" is defined as 30 hours per week at a minimum, which calculates to 1,560 hours worked per year. This definition of full-time employment is also applicable to Trade Adjustment Assistance (TAA) and Re-Employment Trade Adjustment Assistance (RTAA) programs, which ensures consistency among state administered workforce programs.

(dd) Substantial Layoff

The state uses the following definition from the Worker Adjustment and Retraining Notification (WARN) Act of 1988:

Any reduction in force which is not the result of a plant closing and which results in an employment loss at a single site of employment during any 30 day period of: a) at least 500 employees (excluding employees regularly working less than 20 hours per week) or b) at least 50 employees (excluding employees regularly working less than 20 hours per week) and at least 33 percent of the regular full-time workforce (excluding employees regularly working less than 20 hours per week).

(ee) Terminated/Laid off

"Terminated/laid-off" refers only to involuntary discharge not for cause, and precludes enrollment of those individuals who were discharged for cause. Individuals may qualify as having been "laid off or terminated" when the cognizant Unemployment Insurance (UI)

entity has adjudicated the case and determined that the decision to quit the job was warranted. In those instances where the applicant receives formal notification of monetary ineligibility for UI, the career planner may apply the rationale of “discharge not for cause” using information received from the employer regarding the individual’s separation.

(ff) General Announcement

A verifiable form of communication from the employer, authorized representative or designee, informing the public or the employees of the business closure or substantial layoff, which includes a planned closure date for the facility, is required.

(gg) Self-Employed

An individual who was self-employed (including but not limited to employment as a farmer, a rancher or a fisherman) or was a contributing family member in a self-employment endeavor, but is unemployed due to business downturn or failure which occurred as a result of general economic conditions in the community in which the individual resides or because of natural disasters.

(ii) Governor’s Group

Individuals laid off or terminated due to natural disaster or severe economic downturn, as defined and approved by the Governor or his designated representative.

(B). Describe how the State intends to use Governor’s set aside funding. Describe how the State will utilize Rapid Response funds to respond to layoffs and plant closings and coordinate services to quickly aid companies and their affected workers. States also should describe any layoff aversion strategies they have implemented to address at risk companies and workers

GOVERNOR’S FUND 15% SET-ASIDE PLANS

WIOA Title IB funds reserved for state level activities will be used to support the following:

- Rapid Response activities for dislocated workers;
- Disseminating by various means:
 - The State list of eligible providers of training for adults, dislocated workers and youth, including performance, tuition/fees and attendance cost information;
 - Information identifying eligible providers of work-based training opportunities;
 - Information on effective outreach and partnerships with business and service delivery strategies and promising practices to serve workers and job seekers;
 - Information of physical/programmatic accessibility for individuals with disabilities;
- Conducting evaluations;
- Providing technical assistance to local areas in carrying out state plan activities, including coordination and alignment of data systems in support of this Act;
- Assisting various entities provide opportunities for individuals with barriers to employment to enter in-demand industry sectors or occupations and nontraditional occupations, and the development of exemplary program activities.
- Assisting local areas for carrying out the regional planning and service delivery efforts;
- Assisting local areas by providing information on and support for the effective development, convening, and implementation of industry and sector partnerships;

- Providing technical assistance to local areas that fail to meet performance accountability measure;
- Carrying out monitoring and oversight of activities for services to youth, adults, and dislocated workers;
- Providing additional assistance to local areas that have a high concentration of eligible youth; and
- Operating a fiscal and management accountability information system.
- Supporting the state board as it implements workforce activities across the state.

Dissemination of Information

The State invests significant funds to meet this statutory requirement, which includes: eligible providers, outreach, service delivery strategies, accessibility and workforce information. The state's eligible training provider performance reporting system will continue to receive investments to support eligible training providers and comply with increased regulations.

Assisting in the Operation of the One Stop System

The State invests a significant amount of state funds to assist in the support and operation of the One Stop system. This also includes staff development and technical assistance. To ensure more local funds are dedicated to service delivery, state funds are used to supplement the local planning process and other administrative and program activities.

High-Concentration of Eligible Youth

The State reserved \$30,000 to be used to serve high concentrations of eligible youth needing assistance throughout the state. For PY18 & PY19, the state directed efforts to target enrollment of Hispanic and migrant and seasonal farmworker youth across the state. Funds are distributed based on areas demonstrating a need for additional monies.

Fiscal and Program Management

The State invests significant funds to pay for the costs of state administration and program functions such as monitoring, data validation and program assessments. This includes maintaining a fiscal reporting system as well as the annual subscription to America's Job Link for supporting the shared statewide MIS system and assisting with federal reports.

Rapid Response Activities

The Idaho Department of Labor's Workforce Administration Division serves as the state Dislocated Worker Unit with responsibility for the coordination of Rapid Response/ Dislocated Worker/TAA services within the department and other state and local community resources. The department's Rapid Response activities involve and are closely coordinated with the Workforce Services Division, Benefits Bureau, Research and Analysis Bureau, and American Job Center (AJC) locations. The department offers a comprehensive array of services including Title I-B, Wagner-Peyser, unemployment insurance, Trade Adjustment Assistance and veterans' services.

Rapid Response interventions, implemented by the department's Workforce Administration Division and coordinated with the local AJC locations, incorporate all these entities to ensure workers impacted by mass layoffs and closures are seamlessly transitioned to One-Stop

activities. The department also coordinates with labor organizations in arranging services for dislocations involving organized labor. The East-Central Idaho Planning and Development Association in the eastern Idaho also plays a significant role coordinating that area's local resources to meet the workforce needs of impacted workers. These and other program representatives constitute the state's Rapid Response Team.

Local AJC management staff is responsible for coordinating local workforce investment activities in conjunction with the state's Rapid Response efforts, including making WIOA Title I-B resources available to dislocated workers. The staff assists the state in promoting rapid response, early interventions services, and helps to develop response plans to worker dislocations. AJC staff also assists in coordinating services with local economic development efforts and the appropriate local elected officials. The extensive involvement of both AJC management and frontline staff in each early stage of Rapid Response intervention ensures that affected workers are seamlessly transitioned to One-Stop activities.

Employers covered by the Worker Adjustment and Retraining Notification Act (WARN) must submit a notice of plant closures and mass layoffs to the Idaho Department of Labor, which in turn distributes the information to the department's division administrators and state agencies participating in the One-Stop system. The Workforce Administration Division or local AJC management or staff will promptly initiate onsite contact with the employer and the appropriate employee representatives to implement the most effective re-employment activities including financial management, job search assistance and other workshops as requested. If appropriate, fully automated onsite re-employment centers may also be established and staffed. Career and training services are presented as viable options for the workers.

Promoting early intervention to worker dislocations allows the Rapid Response Team to develop the appropriate service delivery strategy for the impacted workers. The response takes into account the impacted workers' skills through individual assessment, their potential for direct job placement and the availability of resources to address their short and long-term needs. Services include onsite information meetings on available employment and training programs, employee surveys, aggressive promotion of services and coordination with training providers.

Each year, the state sets aside a portion of the Title I Dislocated Worker funds, up to 25 percent, to support Rapid Response activities across the state. The funds are first prioritized for supplementing local WIOA Title I services and will support career and training services for the employees of the company. The second priority for funding is to support services for smaller dislocations where the Dislocated Worker Unit and local AJC staff agree that it is appropriate for the local area to take the lead in organizing the response. Funds are available for local areas lacking resources to meet the demand for services. The balance of Rapid Response funds not required to support the above activities is allocated to local Dislocated Worker providers to supplement their area formula-fund allocations. These funds are allocated based on needs (support for carry-in participants and an increase in dislocations). Funds retained for Rapid Response activities at the state level may be allocated for an array of business services, including layoff aversion and other workforce development services to employers to assist and prevent potential layoffs or closures.

The Rapid Response Team also reviews and evaluates the potential for layoff prevention services. The goal of these efforts is to retain the business and to minimize downsizing. If appropriate, the team will present local economic development programs to identify layoff prevention options. These efforts include determining appropriateness of requesting assistance from the state's Workforce Development Training Fund.

The Idaho Department of Labor has years of experience providing Rapid Response services to the Idaho employer community. Its proven track record is evident by its exemplary performance. Department staff take every opportunity to promote the full range of business services at each contact independent of the reason for that contact. This brings a comprehensive range of economic development, workforce development and education services to the attention of the businesses the department serves. Companies view these services as positive, proactive and business friendly.

The state's management information system, *IdahoWorks*, currently provides integrated participant, financial and management reporting for WIOA Dislocated Worker, National Dislocated Worker Grants (NDWG) and TAA program activity. Tracking Rapid Response team activities are also noted in *IdahoWorks*.

(C). In addition, describe the State policies and procedures to provide Rapid Responses in cases of natural disasters including coordination with FEMA and other entities.

Idaho is a sparsely populated state covering a large geographic area, including millions of acres of federal land. Most natural disasters occur on federal land and displace few, if any, individuals and businesses. The Bureau of Land Management coordinates responses for those events affecting federal land; its responses include hiring trained fire crews or utility workers.

For the occasion of a natural disaster requiring assistance from FEMA or other entities, the Idaho Office of Emergency Management is responsible to coordinate the responses of Idaho's state agencies. In the incident of an emergency, including natural disasters, the Idaho Office of Emergency Management (IOEM) activates an Idaho Emergency Operations Center (IDEOC). Depending on the level of emergency, various levels of service are provided to the community. At all levels, as appropriate, the Idaho Department of Labor participates in the agency coordination to ensure critical functions are operating and assistance is available to those in need. These functions include Rapid Response and Disaster Unemployment.

The Idaho Department of Labor's Workforce Administration Division serves as the state Dislocated Worker Unit with responsibility for coordinating Rapid Response services around the state. In the event of an emergency requiring an Idaho Emergency Operations Center, the Idaho Rapid Response Coordinator will ensure that a service delivery team is assembled in the affected area and coordinated with the IDEOC.

Idaho's team for Rapid Response service delivery consists of Idaho Department of Labor staff from the local America Job Centers offering the full-range of one-stop services such as

Employment Services, Unemployment Insurance, WIOA Title I-B Dislocated Worker, Trade Adjustment Assistance and Veterans services. The team may also include representatives from organized labor (if organized labor is affected), and East-Central Idaho Planning and Development Association when serving the East Central District (Service Delivery Area/Region 6).

The Rapid Response team is responsible for coordinating the local Rapid Response services and help develop a response plan for worker dislocations. The primary services provided by the Rapid Response team are WIOA Title I-B Dislocated Worker.

Disaster Unemployment is provided to individuals whose employment or self-employment has been lost or interrupted as a direct result of a major disaster. The program is activated in conjunction with a Presidential Declaration for Individual Assistance. After the FEMA declaration, state planners will prepare to submit a request for a National Dislocated Worker Emergency Grant within 15 days. After the initial provision of Rapid Response services under WIOA Title I, the state planners will consult the Rapid Response team for a recommendation to apply for a National Dislocated Worker Emergency Grant.

(D). Describe how the State provides early intervention (e.g., Rapid Response) to worker groups on whose behalf a Trade Adjustment Assistance (TAA) petition has been filed. (Section 134(a)(2)(A).) This description must include how the State disseminates benefit information to provide trade-affected workers in the groups identified in the TAA petitions with an accurate understanding of the provision of TAA benefits and services in such a way that they are transparent to the trade-affected dislocated worker applying for them (Trade Act Sec. 221(a)(2)(A) and Sec. 225; Governor-Secretary Agreement). Describe how the State will use funds that have been reserved for Rapid Response to provide services for every worker group that files a TAA petition.

WIOA Dislocated Worker and Trade Adjustment programs are both administered through the One-Stop centers. Since the inception of WIA and continuance under WIOA, any means of cost sharing has been emphasized to increase the impact of limited funds. In Idaho, the state-level Rapid Response team includes staff from the dislocated worker, UI and TAA units. When notified of any closure or mass layoff, including those notifications received via Worker Adjustment and Retraining Notification (WARN), the team quickly broadens to include local delivery staff with expertise in provision of Rapid Response, Title I-B Dislocated Worker, UI, TAA and Wagner-Peyser services. This state-local team communicates with the employer and employee representatives, determines if Trade related, assesses initial community impact, identifies and includes other partners for rapid response assistance and develops integrated service delivery schedules to meet the needs of each individual employer and the impacted workers. Informational packets, which may include a survey to determine workers' interests and to use towards the development of a National Dislocated Worker Grant, are distributed to the impacted workers at the Rapid Response event. Team members work closely with service provider management staff to develop a service delivery plan that coordinates resources and ensures One-Stop access to information and enrollment in UI, TAA, WIOA and Wagner-Peyser, many times at the job site prior to dislocation and the filing of a Trade petition. Idaho's

Rapid Response delivery system provides the impacted worker with coordinated application and enrollment for WIOA, TAA and Wagner-Peyser services. Career assessments conducted by WIOA staff are accepted for the TAA program, eliminating client redundancies and streamlining co-enrollment processes. Although co-enrollment is not mandated, Rapid Response service delivery planning helps to ensure the majority of TAA recipients in Idaho are likely to be served with WIOA funds. The state does not require co-enrollment of TAA recipients whenever the individual is WIOA-eligible and receives WIOA staff or other supportive services.

One-Stop TAA staff in Idaho have the background and experience to provide a comprehensive One-Stop assessment through their work with WIOA, ES, UI and TAA programs. Through the collection and analysis of participant information, staff can determine the best mix of services necessary for a TAA participant to obtain employment. Information areas may include an applicant's needs, strengths, support systems, education, job skills, interests, career objectives, and current work search activities. Information may be gathered informally, via interviews or observations, or formally, via assessment tools such as aptitude tests, computer assisted programs and interest inventories. Utilizing this information, these state-merit staff have the tools to guide participants in their work search and career development plans, which includes the option for occupational training through fulfillment of the required six criteria as allowed under TAA. Completing assessment activities for TAA participants eventually helps them "navigate" access to the appropriate One-Stop programs and services, as well as other community services.

(b). Adult and Dislocated Workers Program Requirements

(1). Work Based Training Models

If the State is utilizing work-based training models (e.g. On-the-job training, Incumbent Worker training, Transitional Jobs, and Customized Training) as part of its training strategy and these strategies are not already discussed in other sections of the plan, describe the State's strategies for how these models ensure high quality training for both the participant and the employer.

On-the-job training (OJT) is training activity conducted by a private or public sector employer. This training occurs while the participant is engaged in productive work, learning the skills and information necessary for full and adequate performance on the job. OJTs are an attractive employer option for obtaining employees trained to their specifications, also helping the employees' acquisition of transferable skills to help them obtain employment later, should their current situation change. This effort also helps employers become more aware of the multitude of valuable resources offered by the state's One-Stop Centers. This activity allows businesses to rapidly adapt to changes in technology and the marketplace, making them capable of expanding and remaining competitive with affordable OJT options uniquely designed to achieve their specific developmental goals, especially for small businesses looking

to expand. The activity targets all individuals (Dislocated Workers, Adults and Youth) who are eligible for services under WIOA and may benefit from the availability of OJT options.

OJT Training contracts are directed at employers who are able to provide occupational skill training and full-time employment that leads to self-sufficiency for the participant. Employers must agree first to hire and then to train eligible WIOA/TAA participants. A training payment is provided to the employer to compensate for the extraordinary costs of training; extraordinary costs are those associated with workplace training and additional supervision. This includes those costs the employer has in training participants who may not yet have the knowledge or skills to obtain the job through an employer's normal recruitment process.

The state emphasizes and coordinates learning-rich, work-based opportunities such as on-the-job training as a method to:

- Connect employers to the future workforce
- Expose participants, including youth, to quality employment opportunities, real-world experiences and to the skills (both technical and non-) required for success on the job.

In addition, OJTs

- Improve the state's capacity to market demand-driven services and build relationships with businesses;
- Increase employment opportunities for harder to serve individuals persons, such as the long term unemployed, older workers, and those with limited or sporadic job histories;
- Increase opportunities for the One-Stop system to enhance relationships with businesses;
- Increase percentages of employers hiring and retaining a skilled workforce;
- Increase number and percentages of workers trained and hired;
- Elevate skill proficiencies for workers that will result in increased worker viability;
- Increase responsiveness to labor market issues in the private sector; and
- Increase flexibility at the local level to offer businesses training solutions tailored to respond to the specific needs of the business.

Because of the State's reduced WIOA funding levels, its current policy does not include utilizing customized training, incumbent worker training, nor transitional jobs under WIOA.

(2). Registered Apprenticeship

Describe how the State will incorporate Registered Apprenticeship into its strategy for service design and delivery.

Idaho was one of six states selected by the U.S. Department of Labor to participate in an apprenticeship initiative providing customized technical assistance support from experienced apprenticeship coaches. The State's apprenticeship development team, composed of workforce, apprenticeship, education, and other key partners, was formed in 2016 to take full advantage of

this opportunity to support strategies to integrate apprenticeship as a sustainable solution under WIOA.

Initial project strategies included:

- Launch a renewed apprenticeship effort concentrating on one high growth occupation/industry; provide a positive model for expansion
- Pursue a local area focus first, then expand and strengthen to a statewide strategy
- Lean on USDOL technical assistance and Office of Apprenticeship for guidance, innovation and successful strategies from other states
- Integrate apprenticeships into Idaho's career pathways and industry sector strategies

Since the initial submission of its WIOA Combined State Plan, the state's apprenticeship effort, identified as *ApprenticeshipIdaho*, has made significant progress increasing apprenticeships across the state. Led by the Idaho Department of Labor, *ApprenticeshipIdaho* major partners include the U.S. Department of Labor's Regional Office of Registered Apprenticeship and the Idaho Career & Technical Education, which administers the Carl D. Perkins programs. Representatives from the Division of Vocational Rehabilitation and the Idaho Department of Health and Welfare representing Temporary Assistance to Needy Families and Supplemental Nutrition Assistance Program are also engaged in this effort to develop apprenticeships and create opportunities for their program participants. The Boise, ID chapter of the International Rescue Committee actively participated in the effort to help refugees use their existing skills to re-enter the workforce through a pre-apprenticeship program that pipelines into several large regional hospitals.

ApprenticeshipIdaho has increased the use of registered apprenticeships by 67 percent between 2016 and 2018. Much of this was accomplished by the state as it leveraged multiple resources, including several U.S. Department of Labor grants the state received specifically to expand apprenticeship programs throughout Idaho. This was accomplished by 1) establishing a coordinated team effort to be the point of contact for apprenticeship information and implementation; and 2) developing a concerted outreach effort to educate, convene and partner with business, education and other partners as needed to help fill workforce gaps.

ApprenticeshipIdaho has helped to increase the state's focus on integrated, rather than siloed, business outreach and assistance, ensuring identification and development of career pathways and industry-recognized credentials with each new RA. The state's workforce system prioritized supporting its key industries' growth and technological capabilities by developing a trained workforce throughout the state, and spurred on by facilitated cross training with workforce, education, community and business partners to coordinate communication with specific business sectors. *ApprenticeshipIdaho* partners serve to improve the state's RA capacity, having participated at the local level in groups with other state partner agencies focused on organizing services around business recruitment or generating jobseeker interest leading to enrollment in the work-based learning activity across Idaho workforce programs. Many customers, individual and employers, have benefited from this "tag-teaming" of resources, which continues its success today.

(3). Training Provider Eligibility Procedure

Provide the procedure, eligibility criteria, and information requirements for determining training provider initial and continued eligibility, including Registered Apprenticeship programs (WIOA Section 122).

The Administrative Entity proposed updates to the WIOA Eligible Training Provider (ETP) Policy and Procedures to the State Board, including adopting the ProviderLink module of America’s Job Link system. The state board, the Workforce Development Council, adopted the proposal in July 2018, which has been implemented since that time.

Previously, Idaho had requested a waiver from annual Eligible Provider Performance reporting requirements to include non-WIOA participants. The waiver helped to alleviate some of the hardship the State has faced in moving toward compliance in trying to implement the WIOA ETP requirements, like so many other states across the country. However, this year the state feels more confident it has the appropriate systems in place to collect the data necessary data to meet WIOA mandates. If a waiver is needed, the state will request it separately from this State Plan.

The state’s ETP Policy follows below:

Alternate Criteria for WIOA Eligible Training Providers Initial Eligibility

Institution Criteria:

- Provide a certificate of registration or letter of exemption from the Office of the State Board of Education or other oversight body such as the Bureau of Occupational Licensing authorizing the entity to provide training and collect tuition in the State of Idaho.
- Provide the required data elements in IdahoWorks as directed by the Idaho Department of Labor.
- Successfully complete Equal Opportunity desk review survey located here: <https://www.labor.idaho.gov/WIOA/WIOA-EO-Desk-Survey.pdf>
- Sign agreement to securely collect and report required information for programs.

Program Criteria:

- Program of training leads to a high-growth/high-demand occupation as identified in the Idaho Department of Labor’s annually updated 150 “Top N Hot Jobs” listed on its website – See Appendix A from the link to the state’s ETP policy at the end of this section for more detail.
WIOA participants will be encouraged to select training for an occupation that pays at least \$12 per hour.
- Program of training provides a high-quality experience, including leading to a recognized postsecondary credential or demonstrate a measurable skills gain toward such a credential or employment.

Notes: WIOA participants will be encouraged to select training that leads to an industry- recognized postsecondary credential.

- High quality training experience may be identified by:
 - Physical facilities and/or tools appropriate to meet instructional and skills assessment needs;
 - Reportable skills gain measured by assessments;
 - Industry endorsement;
 - Not having a high dropout rate and/or high student loan default rate and/or poor job placement rate; and
 - Preferably has regional or national accreditation.

Exceptions

- U.S. Department of Labor Registered Apprenticeship (RA) Programs - Upon request from the RA program sponsor, programs are automatically placed on the Eligible Training Provider list. RA programs are encouraged to comply with the requirements in this policy, especially providing information for performance reporting; however, they are not required to do so.
- Public Postsecondary Academic Programs - Academic programs provided by Idaho's public colleges and universities will be approved for initial eligibility under WIOA. These programs will be added to the ETP list upon request of a WIOA career planner from the Idaho Department of Labor and confirmed by the Idaho State Board of Education.
- Out-of-State Providers – Out-of-state providers must be on their respective state's WIOA eligible training provider list. A reciprocal agreement must be signed with the respective state's ETP administrator or appropriate signatory.

Initial eligibility will expire 1 year from date of approval.

Continued Eligibility

A training provider may have their eligibility continued by meeting the following:

- Provide evidence that the Institution Criteria described in the Initial Eligibility section above continue to be met.
- Provider has submitted the required performance data in accordance with the deadlines set by the Idaho Department of Labor.
- The occupation(s) the provider's training program(s) are aligned to continue to be included on the list provided in Appendix A, which is updated annually.

Registered Apprenticeship (RA) programs are not subject to Continued Eligibility and will continue to remain on the Eligible Training Provider list until the sponsor requests to be removed. RA programs are encouraged to comply with the requirements in this policy, especially providing information for performance reporting; however, they are not required to do so.

ETPL Policy Updated July 18, 2018 – <https://wdc.idaho.gov/wp-content/uploads/sites/62/2020/01/ETP-Policy-Final-for-Council-Approval-on-7-18-18.pdf>

(4). Implementation and monitoring priority

Describe how the State will implement and monitor the priority for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient in accordance with the requirements of WIOA sec. 134(c)(3)(E), which applies to individualized career services and training services funding by the Adult Formula program.

The Idaho policy for adult program eligibility and priority is located here: <https://www.labor.idaho.gov/wioa1/policies/Adult-Eligibility-Priority.pdf>. The excerpt for adult priority of service for individualized career and training services follows:

Priority Groups

1. Veterans and eligible spouses receive priority service for all Department of Labor-funded training programs, including WIOA programs.
2. Individuals receiving public assistance, other low-income adults, and individuals who are basic skills deficient have statutory priority service for individualized career and training services under the Adult program.

Order for Priority of Service for Individualized Career Services and Training Services

1. Veterans and eligible spouses who are recipients of public assistance, low income or basic skills deficient.
2. Other individuals who are recipients of public assistance, low income or basic skills deficient.
3. Veterans and eligible spouses who are not recipients of public assistance, low income or basic skills deficient.
4. Other individuals who are not recipients of public assistance, low income or basic skills deficient, but have a potential barrier to employment as defined by WIOA:
 - a. Displaced Homemakers
 - b. English Language Learners, Low Levels of Literacy, Cultural Barriers
 - c. Exhausting TANF within 2 years
 - d. Ex-offenders
 - e. Homeless individuals/runaway youth
 - f. Long-term unemployed
 - g. Migrant and Seasonal Farmworkers
 - h. Persons with Disabilities (including youth)
 - i. Single Parents (Including single pregnant women)
 - j. Youth in foster care or aged out of system
 - k. Individuals within an under-represented demographic, such as sex, race, or ethnicity;

5. Other individuals within these recognized groups:
 - a. Individuals within an under-represented demographic, such as sex, race, or ethnicity.
 - b. Individuals referred by other one-stop partner programs.
 - c. Individuals residing in rural counties.
6. Any other eligible individual determined to be appropriate for services or training to obtain or retain employment.

Low Income Eligibility:

Idaho uses 70% Lower Level Standard Income Level to determine eligibility for low-income WIOA participants under WIOA §(3)(35)(ii).

Monitoring Adult Program Priority

The administrative entity collects quarterly continuous improvement reports (CIR) on WIOA Title IB enrollments. The following table from the CIR report serves as a proxy for adult program priority.

Adult Program

<i>ALL FIELDS ARE CUMULATIVE FOR CURRENT PY</i>	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
<i>1. TOTAL PARTICIPANTS</i>				
<i>1.a. # Low income</i>				
<i>1.b. # Low Levels of Literacy (Basic skills deficient)</i>				
<i>2. TOTAL PARTICIPANTS IN TRAINING</i>				
<i>2. a. # In work-based training</i>				
<i>2. b # attain credential</i>				
<i>3. TOTAL COMPLETED ALL SERVICES</i>				
<i>3. a. EMPLOYED AT EXIT</i>				

(5). Transfer of funds between programs

Describe the State’s criteria regarding local area transfer of funds between the adult and dislocated worker programs.

Transfer of Funds between Adult and Dislocated Worker Programs

Transfer Requests

Under the Workforce Innovation and Opportunity Act (WIOA), the state Workforce Development Council (Council) is given the authority to approve fund transfer requests of up to 100 percent of an area’s program year formula allocation between adult and dislocated worker funds. This authority is provided under WIOA as long as the request meets the Governor’s approval. Any of the region’s service providers may develop a request for a funds transfer during the program year. These requests will be presented to the Council’s executive

director to present to the Council who may then forward an approved request to the Governor for approval.

The transfer request may be submitted in a brief narrative outlining the items below:

- The situation necessitating the transfer, including local conditions (labor market, economic, etc.) contributing to the need for this transfer request.
- How the funds transfer will impact the participant levels in both programs.
- The transfer's effect on current providers of training and other services.
- Describe the expected impact on WIOA performance outcomes for both funding streams.

The Council may endorse a fund transfer request for the Governor's approval, provided that:

- The transfer will not adversely impact an area's capacity to provide adequate and appropriate services to individuals in need of such services provided by the program subject to reduced funding.
- The transfer should also not adversely impact the area's ability to achieve program performance measures established for the current or subsequent years.
- The local area will expend, at a minimum, 80 percent of all funds budgeted to the receiving funding stream by the end of the program year.

Funds Not Available for Transfer Requests

The following funds are not available for transfer requests:

- (1) Adult or dislocated worker funds re-allocated by the Idaho Department of Labor;
- (2) Funds awarded to the state under a National Emergency Grant (NEG); and
- (3) Funds reserved under the governor's 15 percent discretionary rules.

(c). Youth Program Requirements

With respect to youth workforce investment activities authorized in section 129 of WIOA,—

(1) Awarding Youth Workforce grants

Identify the state-developed criteria to be used by local boards in awarding grants for youth workforce investment activities and describe how the local boards will take into consideration the ability of the providers to meet performance accountability measures based on primary indicators of performance for the youth program as described in section 116(b)(2)(A)(ii) of WIOA in awarding such grants.*

*** Sec. 102(b)(2)(D)(i)(V)**

As allowed in WIOA §681.400, the Idaho Department of Labor, as the state's grant recipient/fiscal agent, has exercised its option to provide youth workforce investment

activities. All intake, assessment, completion of individual service strategies, case management and follow-up services are provided within the One-Stop offices by Idaho Department of Labor staff.

Outcomes

Compliance with federal performance guidelines, which provide specific levels of performance for WIOA program outcomes, is critical. Performance indicators may be added or revised to meet federal and state requirements.

- a. Percentage of participants who are in education or training activities, or in unsubsidized employment, during the second quarter after exit from the project.
- b. Percentage of participants in education or training activities, or in unsubsidized employment, during the fourth quarter after exit from the project.
- c. Median earnings of participants who are in unsubsidized employment during the second quarter after exit from the project.
- d. Percentage of program participants who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent during participation in or within 1 year after exit from the program.
- e. Percentage of program participants in an education or training program that led to a recognized postsecondary credential or employment and achieved a measurable skill gain, noting progress towards such a credential or employment.
- d. Effectiveness in serving employers.

(2). Improved strategies for youth achievement

Describe the strategies the State will use to achieve improved outcomes for out-of-school youth as described in 129(a)(1)(B), including how it will leverage and align the core programs, and Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available.

Connecting with Youth remains a major emphasis among the State's Combined State Plan partners. Despite the economy's progress, young people, as a broad group, still appear at a disadvantage in terms of finding employment. This disadvantage is compounded when applied to persons with additional barriers to employment such as being an out-of-school youth.

Since PY2016, the state's Title I Youth program has directed 100% of program funds towards out-of-school youth. Program staff across the state have exclusively targeted their outreach efforts to this population since then, boosted by the Workforce Development Council's directive to focus PY2016 Youth in Need funds be specifically applied towards outreach efforts to out-of-school youth with barriers to employment so these youth understand what services are available to them. This has since been followed up by targeting Youth in Need funds towards Hispanic and MSFW youth across the state, improving youth program enrollment by 100% in PY2019 over PY2018.

A workforce goal identified by the Idaho Workforce Development Council (Section 11(b)(2)(A)) is “Improve the effectiveness, quality, and coordination of programs and services designed to maintain a highly skilled workforce.” Beneath this goal are several strategies specifically designed to target the improvement of out-of-school youth outcomes, including:

- A) Create, align, and sustain partnerships with stakeholders to implement workforce development programs.
- B) Support development in work-based learning, and innovative programs to drive Idaho’s present and future workforce solutions.
- C) Leverage existing local employer-focused initiatives to build and support effective pathways to connect Idahoans to careers.
- D) Cultivate a high-quality One-Stop Career System that connects employers and workers and facilitates access to workforce services, education services, and information.

Out-of-school and disconnected youth specifically benefit from expanded alternative learning modalities and training opportunities developed within Idaho’s education and workforce systems. These may include work-based learning, apprenticeships, distance education, and compressed scheduling. The state’s Title II programs connect participants, including those age 16-24, to career pathways through contextualized education in reading, writing, math and the English language, as well as integrated education and training, and transition into training by utilizing the previously noted modalities. This strategy will improve outcomes for out-of-school youth who may not benefit from or have access to traditional modes of education.

The State workforce partners are enacting more focused efforts around specific youth with barriers, including out-of-school youth, youth with disabilities, and low-skilled youth. The Workforce Development Council has identified the following groups with barriers to employment to receive priority service under the WIOA Title I Youth program for out-of-school youth:

- low-income youth involved with the juvenile justice system;
- low-income youth exiting foster care;
- low-income youth that are pregnant and/or parenting; and
- low-income youth with disabilities.

The Council’s prioritization of out-of-school youth with disabilities for the WIOA Title I youth program serves as a counterpart to Title IV’s requirement to emphasize pre-employment transition services to (in-school) students with disabilities. The alignment of WIOA core programs to maximize service through limited resources continues to improve outcomes for both in-school and out-of-school youth with disabilities throughout the state.

Additionally, the Workforce Development Council has continued with its implementation of an incentives policy to encourage youth achievement. The policy follows on the next page.

WIOA Youth Program Incentives

Purpose: Revise Youth Program Incentives to comply with WIOA.

WIOA allows incentive payments to be made to youth participants, provided the incentives are:

- (a) Tied to the goals of the specific program;
- (b) Outlined in writing before the commencement of the program that may provide incentive payments;
- (c) Aligned with the local program's organizational policies; and
- (d) Issued in accordance with the requirements contained in 2 CFR part 200.

WIOA-funded youth incentives must be connected to recognition of achievement of milestones in the program tied to work experience, education or training provided it be made a part of the participant's individualized assessment and service strategy. The Workforce Development Council and its statewide Youth Committee have reviewed these requirements and established the following incentive policy and accompanying incentive options for implementation beginning PY17. It should be noted that WIOA funds may not be used for incentives for recruitment and eligibility documentation.

This policy and incentive options align with the Workforce Development Council's directive to focus 100 percent of WIOA Youth funding on Out-of-School Youth, as well as WIOA's Youth program outcomes - remediation of basic skills, attainment of HS/GED, gaining industry-recognized skills and credentials that will lead to in-demand, self-sustaining employment.

Limitations on Incentives:

WIOA regulations allow provision of incentives to youth during enrollment in the WIOA Youth program or during the youth's 12-month follow-up time period after completion of the program. Achievements completed prior to WIOA enrollment do not qualify for incentives. WIOA youth program incentives are not intended for use as emergency assistance, but rather as a tool to encourage ongoing participation and attainment of specific program goals. WIOA Youth in need of emergency assistance must be connected to an appropriate service provider.

Policy:

- 1) Requirements for Youth:
 - a) Active in WIOA Youth program *or* follow up activity; b) In collaboration with a career planner, has developed an Individual Service Strategy (ISS) delineating training and employment goals.
- 2) Incentive Documentation:
 - a) Description of achievement to qualify for specified incentive award is documented in case file and *IdahoWorks* management information system as part of the Individual's Service Strategy (ISS) and WIOA career planner intervention in accomplishing the established goals leading to the incentive;
 - b) Supporting documentation of attainment prior to issuance of incentive award (copy of credential/test scores/grades, employer evaluations, attendance record, etc.) retained in case file.

- 3) Incentive Options:
- a) *Credential Attainment* – Attainment of a recognized postsecondary credential or secondary school diploma during WIOA Youth program participation or during the 12-month follow-up period;
 - b) *Measurable Skill Gain* – Attainment of a WIOA Youth skill gain as defined by USDOL for program reporting:
 - i) Achievement of at least one educational functioning level, if receiving instruction below postsecondary education level - [Test Benchmarks Educational Functioning Levels](#)
 - ii) Attainment of secondary school diploma or equivalent;
 - iii) Secondary or postsecondary transcript for sufficient number of credit hours
 - (1) **Secondary:** transcript or report card for 1 semester, or
 - (2) **Postsecondary:** at least 12 hours per semester or, for part-time students, a total of at least 12 hours over 2 completed consecutive semesters
 - iv) Satisfactory progress report toward established skill-based milestone from an employer or training provider;
 - v) Passage of an exam required for an occupation or progress attaining technical/occupational skills as evidenced by trade-related benchmarks.
 - c) *Employment and Retention* – Attainment of fulltime employment in the youth’s selected occupation/industry as reflected in the ISS; 9-month retention with the same occupation/employer.
- 4) WIOA Youth program participants may only participate in one incentive option during a program year.
- 5) Incentives during follow-up may only assist with completion towards predetermined program goals.

Idaho WIOA Youth Incentive Options

- A. A progressive, job retention incentive for youth who have successfully completed all their WIOA Youth program services and attained full-time, unsubsidized employment in the individual’s selected career/industry as planned in the WIOA ISS. Verification of employment and retention by the career planner are required for reimbursement.
 - a. \$100 for obtaining employment.
 - b. \$200 for retaining the same position/employer for 9 months.
- B. A \$150 skill attainment incentive that allows a youth in a work-based activity (OJT, Internship or Work Experience) who can demonstrably show a measureable skill gain verified by the employer/worksites, based upon a positive employer evaluation that enumerates the skill obtained. The evaluations are incorporated as part of the overall process to show the participant’s progress, either at the mid-point of the work-based activity or at the end of the activity, based upon the participant’s goal as established in each activity’s Memorandum of Agreement with the worksite/ employer.

- C. \$100 incentive for each GED section (a total of four) passed during participation in the WIOA Youth Program or during the 12-month follow-up period. Career planners will be allowed the flexibility to provide the GED incentive individually as each test is passed, or cumulatively once the GED is obtained; OR

\$100 Incentive for secondary or postsecondary transcript for sufficient number of credit hours.

- (1) **Secondary:** transcript or report card for 1 semester, or
- (2) **Postsecondary:** at least 12 hours per semester or, for part-time students, a total of at least 12 hours over 2 completed consecutive semesters

- D. \$250 incentive for each area - literacy and numeracy - in which a basic skills deficient participant demonstrates an increase of one or more educational functioning levels based on pre- and post-test scores, utilizing any of the assessments recognized by the National Reporting System for Adult Education programs, including the TABE (Test of Adult Basic Education), Casas, etc. The same assessment instrument must be used for pre- and post-tests - [Test Benchmarks Educational Functioning Levels](#)

- E. \$400 incentive for successful passage of an exam required for employment in a particular occupation, or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks, such as knowledge-based exams that lead to a credential. These may include items such as a welding test or passage of the NNAAP (National Nurse Aide Assessment Program). Exams for general skills, such as a typing test, do not qualify for the incentive.

- F. \$400 incentive for obtaining a recognized postsecondary credential, OR a secondary school diploma or its recognized equivalent. The post-secondary credential must reflect attainment of measurable technical or industry/occupational skills necessary to obtain employment or advance within an industry/occupation based on standards developed or endorsed by employers or industry associations. Certificates must recognize skills specific to the industry/occupation rather than general skills related to safety, hygiene, etc., which excludes credentials such as CPR, OSHA Health and Safety, flagging certification and other similar certifications. Listed below are examples of credentials eligible for this incentive:

- a. Secondary School diploma or recognized equivalent
- b. Associate's degree
- c. Bachelor's degree
- d. Occupational licensure
- e. Occupational certificate, including Registered Apprenticeship and Career and Technical Education educational certificates
- f. Occupational certification

Below is a list of the types of organizations and institutions that award recognized postsecondary credentials. Please note that not all credentials awarded by these entities meet the definition of recognized postsecondary credential.

- A State educational agency or a State agency responsible for administering vocational and technical education within a State;
- An institution of higher education, which includes community colleges, proprietary schools, and all other institutions of higher education that are eligible to participate in Federal student financial aid programs;
- An institution of higher education that is formally controlled, or has been formally sanctioned or chartered, by the governing body of an Indian tribe or tribes.
- A professional, industry, or employer organization or product manufacturer or developer (e.g., recognized Microsoft Information Technology certificates, such as Microsoft Certified IT Professional (MCITP), Certified Novell Engineer, etc.) using a valid and reliable assessment of an individual's knowledge, skills and abilities;
- USDOL Federal Office of Apprenticeship;
- A public regulatory agency, which awards a credential upon an individual's fulfillment of educational, work experience or skill requirements that are legally necessary for an individual to use an occupational or professional title or to practice an occupation or profession (e.g., Federal Aviation Administration aviation mechanic's license, or a State-licensed asbestos inspector);
- A program that has been approved by the Department of Veterans Affairs to offer education benefits to veterans and other eligible persons.
- Job Corps, which issues certificates for completing career-training programs based on industry skills standards and certification requirements.

(3). Effective implementation of 14 program elements

Describe how the State will ensure that all 14 program elements described in WIOA section 129(c)(2) are made available and effectively implemented.*

*** Sec. 102(b)(2)(D)(i)(I)**

The Idaho Department of Labor has been designated as the state's comprehensive WIOA Youth program service provider as allowed under the provisions of the Workforce Innovation and Opportunity Act's Final Rule at 681.400. This section clarified that the competitive procurement provision discussed in the Act (Sec. 123) is only applicable if the local board (please note, Idaho's Workforce Development Council functions as both a state and local board) chooses to award grants or contracts to youth program element service providers other than the grant recipient/fiscal agent.

As the grant recipient, the Idaho Department of Labor is not only eligible to provide service elements under this provision, but also eligible to provide the design framework component of

the youth program. The design framework includes intake, assessment, development of an individual's service plan and overall case management - these will determine whether occupational skills are required by the youth, negating the need for procuring the element. In Idaho, the grant recipient/fiscal agent -the Idaho Department of Labor - will provide youth design framework services.

Extensive surveys and communication with youth service providers found that the WIOA youth elements found to be commonly available in local service areas for youth tutoring, alternative school, education concurrent w/work prep, guidance and counseling, financial literacy education, entrepreneurial skills, labor market information and transition activities will be *coordinated* with other providers in the communities, rather than purchased with WIOA funds.

As the comprehensive youth program provider, the Idaho Department of Labor Workforce Division staff provide both the design framework and element services. Its career planners provide access and/or referral to any of the elements most appropriate for the eligible youth. The Idaho Department of Labor service providers require a program design that includes the 14 required youth elements with an emphasis on the following:

- activities leading to the attainment of a secondary school diploma or its recognized equivalent, or a recognized postsecondary credential;
- preparation for postsecondary educational and training opportunities;
- strong linkages between academic instruction and occupational education that lead to the attainment of recognized postsecondary credentials; and
- preparation for unsubsidized employment opportunities; and
- effective connections to employers, in in-demand industry sectors and occupations of the local and regional labor markets.

To ensure the framework services are effectively implemented, the Idaho Department of Labor has established expectations for objective assessments, individual service strategy and other career planning and follow-up services for youth.

To ensure that youth receive the elements found to be commonly available in local service areas, the providers have developed linkages with the public, private and non-profit service providers of these elements. These linkages include arrangements that ensure a regular exchange of information relating to the progress, problems and needs of participants.

Performance of these service providers are monitored regularly to ensure program integrity. Providers also submit a quarterly continuous improvement report on progress toward the achievement of goals, objectives, expenditure rates, service levels, and other process and outcome measures.

(4). Additional assistance

Provide the language contained in the State policy for “requiring additional assistance to enter or complete an educational program, or to secure and hold employment” criterion for out-of-school youth specified in WIOA section 129(a)(1)(B)(iii)(VIII) and for “requiring additional assistance to complete an education program, or to secure and hold employment” criterion for in-school youth specified in WIOA section 129(a)(1)(C)(iv)(VII).

Because the WIOA youth program will not enroll in-school youth, no criteria have been developed for in-school youth “requiring additional assistance to complete an education program, or to secure and hold employment” specified in WIOA section 129(a)(1)(C)(iv)(VII).

The state Workforce Development Council approved the following criteria for out-of-school youth requiring additional assistance, which was initially recommended by the state’s Youth Subcommittee.

The WIOA Definition for Youth Needing Additional Assistance (Out-of-school Youth):

Low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment:

- A) Has been treated by a professional for mental health issues including traumatic events, depression, or substance abuse related problems. OR
- B) Has been or is a victim of abuse, or resides in an abusive environment as documented by a licensed professional; OR
- C) Has been unemployed for at least three of the last six months (not necessarily consecutive); OR
- D) Has a family history of chronic unemployment (during the two years prior to application, family members were unemployed longer than employed); OR
- E) Limited English speaking or cultural displacement. i.e., refugees.

(5). Not attending school definition

Include the State definition, as defined in law, for not attending school and attending school as specified in WIOA Section 129(a)(1)(B)(i) and Section 129(a)(1)(C)(i). If state law does not define “not attending school” or “attending school” indicate that is the case.

IDAHO CODE 33-202. SCHOOL ATTENDANCE COMPULSORY.

The parent or guardian of any child resident in this state who has attained the age of seven (7) years at the time of the commencement of school in his district, but not the age of sixteen (16) years, shall cause the child to be instructed in subjects commonly and usually taught in the public schools of the state of Idaho. Unless the child is otherwise comparably instructed, the parent or guardian shall cause the child to attend a public, private or parochial school during a period in each year equal to that in which the public schools are in session; there to conform to

the attendance policies and regulations established by the board of trustees, or other governing body, operating the school attended.

Other Idaho codes relating to school attendance:

- Idaho Code 33-201. School Age.
- Idaho Code 33-203. Dual Enrollment.
- Idaho Code 33-206. Habitual truant defined.
- Idaho Code 33-207. Proceedings Against Parents or Guardians.
- Idaho Code 20-510. Information -- Investigation -- Petition.

(6). Basic Skills Deficient definition

If not using the basic skills deficient definition contained in WIOA Section 3(5)(B), include the specific State definition.

Idaho has incorporated the statutory definition from WIOA Section 3(5)(A) - “who is a youth, that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test.”

(d). Single-area State Requirements

In States where there is only one local workforce investment area, the governor serves as both the State and local chief elected official. In such cases, the State must submit any information required in the local plan (WIOA section 106(d)(2)). States with a single workforce area must include—

1. Any comments from the public comment period that represent disagreement with the Plan. (WIOA section 108(d)(3).)

All public comments are submitted in the Appendices.

2. The entity responsible for the disbursement of grant funds, as determined by the governor, if different from that for the State. (WIOA section 108(b)(15).)

Not applicable. The Idaho Department of Labor is the entity responsible for the disbursement of grant funds.

3. A description of the type and availability of WIOA title I Youth activities and successful models, including for youth with disabilities. (WIOA section 108(b)(9).)

Extensive surveys and communication with youth service providers found that the WIOA youth elements found to be commonly available in local service areas for youth tutoring, alternative school, education concurrent w/work prep, guidance and counseling, financial literacy education, entrepreneurial skills, labor market information and transition activities will be coordinated with other providers in the communities, rather than purchased with WIOA

funds. In addition, WIOA and its regulations clarify that awarding a grant on a competitive basis does not apply to the design framework component where the grant recipient/fiscal agent provides these services. The design framework includes intake, assessment, development of an individual's service plan and overall case management. These will determine whether occupational skills are required by the youth, negating the need for procuring the element. In Idaho, the grant recipient/fiscal agent -the Idaho Department of Labor - will provide youth design framework services.

The remaining youth elements - paid/unpaid work experiences, leadership skills, supportive services, and adult mentoring – are also provided through the Idaho Department of Labor, since it has exercised its option to provide youth workforce investment activities as the grant recipient, as noted in the response to item (C)(1) earlier in this narrative. Youth with disabilities are a priority group for the WIOA Title I Youth program. The state has made significant efforts to ensure that services to youth with disabilities are provided in the same capacity as those without disabilities and the needs of this population are properly addressed. Many of the WIOA Youth program staff were trained under a DEI grant for service provision to the targeted youth. Most WIOA partner staff providing services to employers develop key relationships with businesses to provide opportunities for work-based activities for youth with disabilities. Strong partnerships with the Idaho Division of Vocational Rehabilitation, Idaho Commission for the Blind and Visually Impaired and Idaho Educational Services for the Deaf and the Blind are utilized to develop and undertake activities as diverse as Ropes courses for teamwork and leadership development to week-long work readiness camps that help these youth achieve success by building their confidence, self-esteem and job seeking skills.

4. A description of the roles and resource contributions of the one-stop partners.

The State developed guidelines for developing infrastructure and resource sharing agreements. The entire policy is located here: <https://labor.idaho.gov/wioa1/policies/Infrastructure-Funding-Agreement-Guidance.pdf>. An excerpt relating to the roles of the one-stop partners is below.

Workforce Development Council/Governor's Guidance for WIOA One-Stop Infrastructure Funding Agreements

The guidance provided here is supplemental to the Idaho American Job Center Network MOU and the Service Delivery Area MOU templates approved by the One-Stop Committee. The Infrastructure Funding Agreement resulting from this guidance will be an addendum to the Service Delivery Area MOUs for SDAs 2 and 6. This guidance may be used by any of the other Service Delivery Areas at a later time.

I. State Administered One-Stop Program Guidelines

The following are instructions from the State-administered one-stop partners for assigning the roles for identifying infrastructure costs and contributions to the one-stop infrastructure funding agreement in the local areas.

Idaho Career-Technical Education

Perkins Postsecondary Programs– ICTE delegates authority for local negotiations to the technical college representatives.

Adult Education and Family Literacy Act - Adult Education Programs – ICTE delegates authority to technical college leadership staff person (dean or VP) with authority over Adult Education program. This person will work with the head of Adult Education program as part of the negotiation process.

Idaho Commission on Aging

Senior Community Service Employment Program – The State-administered SCSEP program delegates authority to their service provider Easterseals-Goodwill. Admir Selimovic will negotiate on behalf of this grant.

Idaho Division of Vocational Rehabilitation

WIOA Title IV Vocational Rehabilitation – The Division retains state authority for all infrastructure funding negotiations.

Idaho Department of Health and Welfare

Temporary Assistance for Needy Families – The Department retains state authority for all infrastructure negotiations for TANF and any other IDHW-administered program (e.g., Supplemental Nutrition Assistance Program).

Work-related Employment and Training Programs – The Department delegates all negotiation authority to their service provider Maximus, as consistent with the IDHW contract.

Idaho Department of Labor - The Department delegates all negotiation authority for the following programs to its area managers.

WIOA Title IB Employment and Training Programs

WIOA Title III – Wagner-Peyser/Employment Services

TAA – Trade Adjustment Assistance

Jobs for Veterans Grants

Unemployment Insurance – The Deputy Director/Unemployment Insurance Division Administrator will negotiate on behalf of this program.

Idaho Commission for the Blind and Visually Impaired

WIOA Title IV VR– The Commission retains all authority for infrastructure funding negotiations.

Community Council of Idaho

National Farmworkers Jobs Program - CCI retains authority for infrastructure funding negotiations across the state.

II. Cost Allocation Approach Guidelines

There are two statutory methods of infrastructure cost funding: the Local and State Funding Mechanisms. Local areas must first attempt the Local Funding Mechanism process before appealing to the State Funding Mechanism.

This section describes the Local Funding Mechanism process, including instructions for developing the one-stop operating budget and a recommended cost allocation methodology.

Local Funding Mechanism Process

Following WIOA guidance in TEGL 17-16, RSA-TAC-17-03, and OCTE Program Memo 17-03 that spells out the steps for determining shared funding for infrastructure, the one-stop partners are to begin negotiating infrastructure costs under the “Local Funding Mechanism” as follows:

1. Determine local one-stop operating budget by including the following:
 - a. Infrastructure
 - b. Additional costs (career and shared services)
2. Develop a fair cost allocation methodology based on the relative use and benefit of each one-stop partner;
3. Determine the partners’ proportionate share of the infrastructure costs and required services costs. The proportionate share is the starting point for the negotiations.
4. Negotiate partners’ contributions
 - a. Partners can contribute any amount they wish to negotiate as allowed by the program
 - b. Partners may contribute (as allowed by program grant)
 - i. Cash
 - ii. Non-Cash
 - iii. Third party in-kind

Developing the One-Stop Operating Budget

Infrastructure

Infrastructure costs are defined in WIOA Joint Rules (20 CFR 678.700, 34 CFR 361.700, and 34 CFR 463.700) as the non-personnel costs necessary for the general operation of the one-stop center. These are building-related costs only. Local areas are instructed to only identify infrastructure costs for the comprehensive one-stop center in the local area.

Infrastructure categories

- Rent
- Property Insurance
- Utilities
- Access Technology (phone, internet)
- Equipment
- Supplies
- Maintenance
- Janitorial contracts

- Security contracts
- Common Identifier (Updating building with American Job Center signage)

Additional Costs (System Delivery Costs)

System delivery costs are the additional costs required to operate the one-stop delivery system. These additional costs must include career services, and may include other common non-infrastructure costs and shared services costs. These costs should include services provided by all partners within the service delivery area, as well as the costs for the services provided in the comprehensive one-stop center.

Career services are defined in WIOA Joint Rule (20 CFR 678.430, 34 CFR 361.430, and 34 CFR 463.430). Some partner programs provide more career services and expend greater costs for those services than others. For the purpose of developing the operating budget, the costs of career services are attributed to each program providing the career services. Each partner should provide the costs of the staff and other program expenses directly associated with providing career services.

The local partners may determine common non-infrastructure costs. These may include costs for common printed materials in the one-stop center or for one-stop operator services such as coordinating business services and other regional coordination.

Shared services are defined in WIOA Sec. 121(i)(2) as those commonly provided through the one-stop partner programs to any individual, such as initial intake, assessment of needs, appraisal of basic skills, identification of appropriate services to meet such needs, referrals to other one-stop partners, and other similar services. For the purpose of developing the operating budget, partners may determine which of their career services may be considered shared services.

Recommended Cost Allocation Methodology

The recommended allocation base uses the square footage of the comprehensive one-stop center.

The methodology described below is recommended, but not definitive. However using the square footage of the public, shared space as an allocation base is a fair way to allow cost contributions from the non-co-located partners who are also required to contribute to infrastructure costs.

- Co-located partners are assigned the proportionate share based on the direct space used by the program, such as program staff cubicles. Direct space shared by two or more co-located partners may be allocated using full-time equivalent positions.
- All partners are assigned proportionate shares based on the public, shared customer space, which includes lobby area, resource room and public restrooms. This space may also include interview rooms or conference rooms available to any one-stop partners. Proportionate shares of the public, shared customer space may be allocated by using

number of program participants in the region or the partners may simply decide to split the amount evenly among the partners.

The results from any cost allocation are not definitive; they are viewed as a starting point for what the partner programs can contribute.

Recommendations for One-Stop Partner Program Contributions

All required one-stop partners have a mandate to contribute to infrastructure costs and system delivery costs. Other one-stop partners in the service delivery system are encouraged to contribute to the costs.

All programs may contribute cash toward these costs. Most programs will be able to contribute noncash or third-party in-kind. Each program's contributions must be consistent with the program's authorizing statute and regulations, as well as 2 CFR 200. Additional information on program contributions is found in each agency's subregulatory guidance (TEGL 17-16, RSA-TAC 17-03, and OCTAE Program Memo 17-3).

All one-stop partners will contribute at least one day of annual cross-training toward the additional system delivery costs.

5. The competitive process used to award the subgrants and contracts for title I activities.

In Idaho, the state Workforce Development Council also operates as the local workforce board for the state as allowed by waiver in the approved 2016-2019 WIOA State Plan and authorized in WIOA Sec. 107(c)(4). Thusly, the Workforce Development Council is responsible for the selection of Title IB providers, including the competitive procurement of the One-Stop Operator. The Workforce Development Council adopted a policy on the selection of service providers on April 11, 2019.

As a state entity, the Workforce Development Council must follow state procurement policy as authorized by the Uniform Guidelines under 2 CFR 200.320. The State Procurement Act in Idaho Code Title 67, Chapter 92 charges the Administrator of the Division of Purchasing with acquiring all property for state agencies and overseeing all solicitations. Solicitations are required to be competitive, except as otherwise provided by statute or rule.

6. How training services outlined in section 134 will be provided through individual training accounts and/or through contracts, and how such training approaches will be coordinated. Describe how the State will meet informed customer choice requirements regardless of training approach.

Idaho Title I-B program offers training opportunities to eligible participants in the Adult, Dislocated Worker, and Out-of-School Youth programs, using both Individual Training Accounts (ITAs) and contracts with employers to provide on-the-job training. The State

provides detailed technical assistance guides to local service providers referring participants to training.

Because of its small population and rural nature, the Governor does not maintain a list of On-the-Job training (OJT) providers. Rather, on-the-job training is generally approached as job development negotiated with an employer for eligible participants. A copy of Idaho's Technical Assistance guide, which provides WIOA Title I-B staff direction on the implementation of OJT opportunities, is located here:

<https://www.labor.idaho.gov/dnn/Portals/0/WIOA/Tags/wioa-technical-assistance-guide.pdf>.

Idaho maintains an extensive Eligible Training Provider List (<https://www.labor.idaho.gov/dnn/Portals/0/WIOA/Idaho-etp.xlsx?v=1.7>) to ensure consumer choice for occupational skills training is provided for all areas of the state. The state's technical colleges, proprietary schools, and Registered Apprenticeship sponsors/employers regularly submit new programs to add to the list, especially those programs that align eligible training to in-demand occupations in Idaho's high-demand industry sectors. Although the state has encountered difficulty in the past collecting performance data from the training providers, it has overcome the obstacles preventing this collection from taking place.

WIOA Title I-B career planners provide assistance to program participants navigating the available training options by reviewing the local or market demand for the occupational skills, and costs of training. The state's WIOA Technical Assistance Guide (cited earlier) contains information regarding occupational skills training and how program staff may provide this service to participants who may show the need for this benefit.

7. How the State Board, in fulfilling Local Board functions, will coordinate title I activities with those activities under title II. Describe how the State Board will carry out the review of local applications submitted under title II consistent with WIOA secs. 107(d)(11)(A) and (B)(i) and WIOA sec. 232.

The state Workforce Development Council (Idaho's WIOA state board), through its One-Stop Committee, ensures that activities and services are coordinated with Title I and Title II, as well as the other one-stop partners.

The Council carried out the review of local applications submitted under Title II in the spring of 2017. The Board received a presentation about the description of the process, including the timeline, and the Board chair appointed an ad hoc committee to conduct the review. A copy of that presentation is located here: <https://www.labor.idaho.gov/wioa1/meetings/011117/adult-education-wdc.pdf>. With this year's funding cycle (PY2020) for Title II services, the Council will again be included as it participates in the review of this year's applications.

8. Copies of executed cooperative agreements which define how all local service providers will carry out the requirements for integration of and access to the entire set of services available in the one-stop delivery system, including

cooperative agreements with entities administering Rehabilitation Act programs and services.

All of the State-level One-Stop Partners, including the entities administering Rehabilitation Act programs and services, developed a statewide Memorandum of Understanding for the Idaho American Job Center Network. This document sets the standard for how service delivery is provided and integrated throughout the entire state. The executed MOU is located here: <https://www.labor.idaho.gov/wioa1/policies/Executed-Idaho-AJC-Network-MOU.pdf>.

To allow for local differences, the One-Stop Committee developed a template to assist local providers in documenting specifics on how the standards are met within a service delivery area, including information about the American Job Centers and other locations where the public can receive one-stop services. <https://www.labor.idaho.gov/wioa1/onestop/091217/Trans1.pdf>

(e). Waiver Requests (optional)

States wanting to request waivers as part of their Title I-B Operational Plan must include a waiver plan that includes the following information for each waiver requested:

Waiver Request 1 –

Allow the State Board to carry out the roles of a Local Board (WIOA Section 107(b))

(1) Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan;

The State of Idaho is formally seeking a waiver to permit a state board to carry out the functions of a local board. This waiver request is for a renewal of a waiver previously applied to 20 CFR 679.310(f) which states that a state board must carry out the roles of a local board when the State Plan indicates that the State will be treated as a local area under WIOA. The Workforce Innovation and Opportunity Act Sections 106(d)(2) and 107(c)(4) also direct a state board for a single state local area to carry out the functions of the local board. The Workforce Development Council has acted as both the state and local board under WIA since 2005, under WIOA since 2014, and the current structure is reflected in the Combined State Plan.

(2) Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;

No state or local policies limit the Governor's authority to require a regional plan or utilize the Workforce Development Council as the local workforce board for the state.

(3) Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;

The primary goal to be achieved by this waiver is to reduce annual overhead and maximize the available money directed to program services, especially training and work-based learning, and services to business. The programmatic outcome is to serve a larger number of participants than would otherwise be served due to added administrative costs. To maximize resources available for service delivery, the state continues to use the Workforce Development Council as the local workforce board throughout the state. When initially implemented, this saved the WIA program in the state approximately \$1.5 million dollars by removing the administrative overhead of maintaining six regions throughout the state. Since then, these former administrative funds have been utilized as program funds allowing for more participants to be served.

As evidenced since its initial implementation, Idaho's single statewide planning structure has continued to reduce annual overhead, and maximizes the available funding directed to training and services to business and job seekers.

This statewide structure enhances efforts to transform the system into a demand driven system. The 11 Idaho Department of Labor offices and its mobile locations across the state serve as the state's American Job Centers offering the full range of workforce development services. This recognizes the importance of sharing data and information about new and expanding businesses to build the economy across regions.

(4) Describes how the waiver will align with the Department's policy priorities, such as:

(A) supporting employer engagement; (B) connecting education and training strategies; (C) supporting work-based learning; (D) improving job and career results, and (E) other guidance issued by the Department.

The Workforce Development Council structure has been in place since the Jobs Training Partnership Act. Its current membership aligns with the prescribed composition under WIOA, including a majority of business representatives, along with partners from government, labor, community-based and educational entities. State education policy is thoroughly aligned with the state's workforce development goals.

(5) Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment;

The change to a single statewide regional planning structure, in conjunction with this waiver, has allowed for an average annual increase in training opportunities for more adults, dislocated workers and at-risk youth, and has since permitted the state to maintain service levels despite funding cuts over the years.

(6) Describes the processes used to:

(A) Monitor the progress in implementing the waiver; B) Provide notice to any local board affected by the waiver; (C) Provide any local board affected by the waiver an opportunity to comment on the request; (D) Ensure meaningful public comment, including comment by business and organized labor, on the waiver. (E) Collect and report information about waiver outcomes in the State's WIOA Annual Report.

As evidenced since its initial implementation, the single statewide planning structure has reduced annual overhead, maximizing the available money directed towards program services, including training/work-based learning, and services to business and job seekers. In the spirit of WIOA's intent, the State has emphasized spending program funds towards those individuals most in need and who can benefit from intensive staff intervention, and direct training and support of businesses and participants, all of which positively impact the achievement of performance goals.

The single statewide structure has strengthened administrative oversight and accountability processes. Prior to this change, administrative deficiencies resulted in substantial disallowed costs for Idaho's largest Workforce Investment Area. Under this waiver, the strengthened administrative structure has assisted Idaho to avoid future disallowed costs and will continue to do so, thus further enabling the redirection of funds from service provider and administration to direct participant training and support.

Idaho's waiver request has been posted on the Idaho Workforce Development Council's website for comment and review by required parties and the general public. No local boards are affected by the waiver. A copy of this waiver request was provided to all members of the state Workforce Development Council, along with the PY2020-2023 Combined State Plan. The State Workforce Development Council' Executive Committee, approved the request for submission of a waiver and the state plan during its **ADD APPROVAL DATE**. The meeting was announced and opened to the public.

Any public comments received regarding this waiver will be forwarded to the USDOL and included as a modification to the state's Combined Plan. The impact of this waiver on the state's performance will be addressed in the state's WIOA Annual Report.

The waiver outcomes will be collected and reported in the State's WIOA Annual Report.

(7) The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver.

Not applicable.

Title I-B Assurances

The State Plan must include the following assurances:

1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient. **Yes**
2. The state has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist. **Yes**
3. The state established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members. **Yes**
4. The state established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2). **Yes**
5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership. **N/A**
6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the state consults with chief elected officials in local areas throughout the state in determining the distributions. **Yes**
7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7). **Yes**
8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan. **Yes**
9. If a State Workforce Development Board, department, or agency administers state laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I. **Yes**
10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report. **Yes**
11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3). **Yes**