

**STATE OF CALIFORNIA
WORKFORCE INVESTMENT ACT (WIA)
WAIVER REQUEST**

**Waiver Relating to Performance Measures for Summer Youth Activities Funded
by WIA and Temporary Assistance for Needy Families (TANF)**

The California Workforce Investment Board (State Board) and the Employment Development Department (EDD), as the administrative entity of the WIA, submit this request for a waiver to the use of Common Measures for Youth enrolled in summer employment activities funded in conjunction with TANF funds.

In keeping with the guidelines set forth at WIA Section 189(i)(4)(B) and 20 Code of Federal Regulations Part 661.420(c), please accept the following as a request for waiver.

The State Board respectfully requests a waiver to common measures for youth to allow the State to use the work readiness indicator as the only performance measure for youth co-enrolled in WIA and TANF summer employment activities. The Common Measures waiver was granted to the State on December 11, 2007 and extended through December 31, 2011. This waiver request would permit the work readiness indicator to be used during the period May 1, 2012 through September 30, 2012.

A. Statutory or Regulatory Requirements to be Waived

Common Measures for Youth specified in Employment and Training Agency Training and Employment Guidance Letter 17-05 and approved for use by California on December 11, 2007.

B. Goals of the Waiver and Expected Programmatic Outcomes if Waiver is Granted

Focusing on the work readiness indicator allows the State Board and its local areas to give youth a unique opportunity to explore work experiences that may not have been possible without the pooling of WIA and TANF funds. Without this waiver, the performance requirements would impede the true intent of this summer employment program as concerns over performance would overshadow the great opportunities and choices given to California's youth during these challenging economic times.

Local areas are currently receiving their Program Year (PY) 2012 Youth allocations and significant TANF funding, if leveraged, can also be used to provide subsidized summer employment opportunities to youth. TANF agencies are encouraged to pool their resources with local areas to provide programs for low-income and at-risk youth. By applying this flexibility to programs funded in conjunction with TANF funds, local areas will have the option to combine all available funding resources, and therefore work

cooperatively with TANF agencies to craft and provide the best summer youth employment programs possible.

Allowing the local areas this flexibility will in turn allow them to use more of their resources to focus on the critical goal of offering at-risk youth with subsidized summer employment activities, without creating new administrative burdens.

This waiver becomes even more critical as the youth employment rate has continued to remain extremely low during the current economic downturn. The need still exists for continued outreach and opportunity. If this waiver is granted, the local areas and TANF agencies will be able to expeditiously serve low income participants as well as those with barriers to employment, such as out-of-school youth and those most at risk of dropping out; youth in and aging out of foster care; youth offenders and those at risk of court involvement; homeless and runaway youth; children of incarcerated parents; migrant youth; Indian and Native American youth; and youth with disabilities. The local areas will offer supportive services, occupational skills training, and other relevant services youth this summer.

C. State or Local Statutory or Regulatory Barriers

There are no State or local statutory or regulatory barriers to implementing the proposed waiver.

D. Description of Individuals Impacted by the Waiver

Youth participants ages 14 to 21 are impacted by this waiver request. In addition, the local areas, local TANF agencies and their business partners that employ the eligible youth will be impacted. Only youth participants co-enrolled in both the WIA youth program and TANF will be affected by this waiver.

At this time this requested waiver will only affect the Los Angeles County Workforce Investment Area. If other local areas desire to utilize the waiver, they will be required to submit separate requests to EDD.

It is anticipated that where these TANF and local area partnerships are formed and already operating, both the WIA youth funds and TANF funds will be used to pay wages for youth this summer. Some of these youth will be eligible for both funding sources and may be co-enrolled in both programs. Each youth will meet the eligible criteria for their appropriate funding source (age, eligibility, etc.). Additionally, both WIA and TANF funding will be used to pay youth wages plus contractor costs to run and supervise the youth as appropriate.

The local areas are best positioned to make determinations and assessments of the youth participating in the summer employment opportunities. For those older youth that are not expected to return to school, individual service plans and strategies will be

documented and the participants will be enrolled in WIA Adult programs or provided further education and training under WIA youth funded activities.

E. Opportunity for Public Comment and the Process for Monitoring Implementation of the Waiver

Due to the expediency required to implement this program, the public comment period is reduced to 10 calendar days to ensure the necessary flexibility is provided to local areas in a timely manner to effect these summer youth programs and the youth served by them.

If this waiver is approved, youth who are in need of additional services under WIA shall have the justification documented in their individual service plans and will be enrolled into other experiences such as WIA youth services or co-enrolled into a WIA Adult program or service.

The State Board and the EDD, as the administrative entity of the WIA in California, will monitor all summer youth employment programs. The State's current monitoring policy/procedures will be modified to include a review of the appropriate youth participant plans.