STATE OF CALIFORNIA
WORKFORCE INVESTMENT ACT (WIA)
WAIVER REQUEST

Waiver Relating to Program Design Flexibility for Summer Youth Activities

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 apply the program design flexibility for summer youth outlined in Training and Employment Notice 35-11 for youth enrolled in summer employment activities funded with WIA youth formula allocations in conjunction with Temporary Assistance to Needy Family (TANF) monies.

This request seeks this waiver of WIA Section 129(c)(2) for three consecutive program periods: May 1, 2014 through September 30, 2014; May 1, 2015 through September 30, 2015; and May 1, 2016 through September 30, 2016.

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.

A. Statuary or Regulatory Requirements to be Waived

The State Board respectfully requests a waiver of the required program elements in WIA Section 129(c)(2). The waiver would apply to youth co-enrolled in summer youth employment activities funded by WIA youth formula allocations in conjunction with TANF monies.

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

The goal of this waiver request is to provide the Los Angeles County local workforce investment board (local board) with the flexibility to determine the type and level of assessment to be included in an Individual Service Strategy (ISS) for youth participating in a summer youth employment activity during the summer months only, and if the 12 month follow-up will be appropriate for these youth participants.

If this waiver is granted, the local board and its TANF agency partners 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 run-away youth; children of incarcerated parents; migrant youth; Indian and Native American youth; and youth with disabilities. The local board and its partner agencies will offer supportive services, occupational skills training, and other relevant services for youth this summer.

Overall, the youth employment rate has continued to remain extremely low during the current economic downturn. Regular WIA youth formula funding exists and TANF funding is also available. The granting of this waiver will assist TANF entities and local areas to pool their resources to provide opportunities for low-income and at-risk youth. During the period of May 1, 2013 through September 30, 2013, approximately 1,700 youth were co-enrolled in both WIA and TANF. Through the leveraging of both of WIA and TANF dollars, L.A. County was able to augment services to better meet the needs of L.A. County's youth. All 1,700 youth obtained summer jobs. It is estimated that leveraging this funding, given the set aside of $1.1 million remains at its current level at minimum, 700 youth should be served annually through this waiver, although the hope is that this number will be exceeded as was the case this year.

Allowing for flexibility in assessments, ISSs, and follow-up services allows the State Board and the 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 ECF. Without this waiver, the assessment and follow-up requirements would impede the true intent of this summer employment program as concerns over monitoring and separation of funding streams would overshadow the great opportunities and choices given to California's youth during these challenging economic times.

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 16 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 co-enrolled in WIA youth programs and TANF will be affected by this waiver.

Currently, the requested waiver will only affect the Los Angeles County Workforce Investment Area. If other local areas desire to use the waiver for their summer programs, they will be required to make separate requests to EDD.

It is anticipated that where these TANF and local area partnerships are formed and 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.