

VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

The State must address all program-specific requirements in this section for the WIOA core programs regardless of whether the State submits either a Unified or Combined State Plan.

PROGRAM-SPECIFIC REQUIREMENTS FOR ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES UNDER TITLE I-B

The Unified or Combined State Plan must include 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, and has not failed any individual measure during the same period.

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 misspent 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

On April 7, 2020, the state Workforce Development Council updated its initial Designation of the Local Area policy and developed a policy for identifying region(s). Although these were posted for public comment during the state’s PY2020-2023 Combined State Plan process and no comments

were received, the state has determined that it may need to revise the Local Area designation policy to incorporate several changes as directed by USDOL.

[Local Area Designation and Policy](#) (link to draft policy)

[Region Identification and Policy](#) (link)

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:

Executive Director of the Workforce Development Council
317 West Main Street
Boise, Idaho 83735

The Executive Director 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 it is received by the Executive Director of the Workforce Development Council 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 to be the date of filing. Any appeal that is filed late shall be summarily dismissed.

The Chair of the Council will select a hearing officer. The appeal shall be heard by the hearing officer not more than forty-five (45) days after the appeal was filed. With the consent of the appealing party, the hearing may be held after the 45-day period, but in no case shall the hearing be conducted more than sixty (60) days 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 (10) calendar days 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 and WIOA.

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 Executive Director of the Council.

The recommended decision of the hearing officer shall be placed on the agenda of the next Council meeting for disposition, if there are at least 14 calendars days remaining prior to the meeting; however, if no Council meeting is scheduled within forty-five (45) days of the date the decision was issued, 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 (30) days 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
317 West Main Street
Boise, Idaho 83735

The Secretary will notify the Governor and the appellant in writing of the Secretary's decision.

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 and local operational policy for use by all WIOA service providers and may be found on the Idaho Department of Labor's (serving as the state's WIOA Administrative Entity) at the following link - ID State WIOA Program Policies. All statewide policies for Governance, WIOA Title IB, and One-Stop System reside on the Council's website via the following link - Idaho WDC Policies.(link)

The following policies, however, are currently under review and slated for revision based on updated USDOL guidance or process changes.

- Idaho Guidance for WIOA Adult Program Service Provision last updated July 14, 2016 – The update will incorporate most current WIOA 2022 Lower Living Standard Income Level (LLSIL) dated 4/6/2022. The current income levels, however, are in place for use by program staff.
- Idaho Policy for WIOA Eligible Training Providers Idaho Eligibility Criteria and Procedures Adopted 04-07-2020 – This policy needs to incorporate guidance from TEGL 08-19.
- Statewide Service Policies for WIOA Service Provision Updated October 25, 2017 – The youth incentive policies have been updated but are not contained within this bundle.
- [WIOAP 01-21 - Management Information System](#) and [WIOAP 03-20 - National Dislocated Worker Policy](#) – A reference to TEGL 22-15, which was cancelled in 5/12/16, was inadvertently left in both narratives and should be removed.
- [WIOAP 01-20 - Change 1 - Measurable Skill Gains](#) and WIOAB 12-19 – These are interchangeable guidance in which one contains a reference to TEGL 10-16 but should be updated to include “Change 1”. Reference to each will also be incorporated.

- [WIOAP 01-19 - Individual Service Strategy Policy](#) – As with others listed, the reference to TEGE 21-16, should be updated to include “Change 1”.

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.
- Support 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 funds to serve high concentrations of eligible youth needing assistance throughout the state. From PY18 through PY21, 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 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 and Title I-B provider staff are 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 and Rapid Response 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 various program staff from the local American 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 staff 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 staff 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 continued on with 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. Rapid Response service delivery planning helps to ensure the majority of TAA recipients in Idaho are likely to be served with WIOA funds. Like the federal program, the state requires 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 and 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 (including discretionary grants) 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 promote demand-driven services and build relationships with businesses;
- Increase employment opportunities for harder to serve individuals, 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 (e.g., job center staff taking applications and conducting assessments).

Idaho's apprenticeship development team, composed of workforce, apprenticeship, education, and other key partners, was formed in 2016 to support strategies to integrate apprenticeship into statewide workforce systems. The state's efforts towards advancing Registered Apprenticeship (RA) in Idaho have shown significant positive results as its increased sponsorship levels 71% since FY2018 and increased the total number of apprentices 31% during that same time frame .

The Idaho Department of Labor's (IDOL) Registered Apprenticeship Unit is the state's primary organization which develops, writes, and submits RA standards for registration with USDOL-Office of Apprenticeship. IDOL's RA team guides sponsors through the Registered Apprenticeship Program (RAP) development process and serves as the only program providing technical assistance to sponsors through the sponsorship life-cycle and RAP expansion. Technical assistance offerings include Registered Apprenticeship Partners Information Database System (RAPIDS, for RA reporting) , IdahoWorks (the state's workforce management information system), job postings, mentor training, and EEOC. Supporting these efforts are the internally developed resources such as the online Apprenticeship Idaho Sponsor Success Guide, online Mentor Training System, and the innovative Sponsor Journey Map, a nationally recognized best practice by USDOL/Maher & Maher for state apprenticeship agencies which guides partners through the RAP development process.

Partnership and Alignment to Support Workforce System Integration

To strengthen the bond between apprenticeship and workforce development system, Registered Apprenticeship goals are strategically aligned with regional and statewide education and workforce development plans. IDOL is a founder of the newly formed Apprenticeship Idaho Coalition. Together with state's Workforce Development Council, Idaho Career Technical Education, AFL-CIO, Idaho Business for Education, Idaho Division of Vocational Rehabilitation, and Idaho Department of Corrections, the coalition connects across individual grants to support overall system expansion. Coalition leaders work collaboratively to achieve increased growth, development, modernization, and diversification of RAPs across Idaho. Meeting biweekly, the coalition hosts training and technical assistance events for employers, sponsors, and related-training instruction (RTI) providers across the state.

As recipients of three distinct apprenticeship grants, IDOL plans to continue the state's focus on innovating and modernizing its RAP systems through expansion and development of the following projects:

- **Increase Career Ladders** in the Most In-Demand Occupations in Need of Skilled Labor – Challenged with needing additional support in creating RAPs for the lowest skilled workers, ApprenticeshipIdaho plans to create pre-set and customizable career ladder/career lattice models to help employers with the most in-demand occupations
- Develop a quality **framework for Pre-Apprenticeship Programs** leading to RAPs. – Research and design of a Pre-Apprenticeship Program, including curriculum development in areas of highest industry need, development a directory of Pre-Apprenticeship Programs and providers, and the potential development of a certification process.
- **Diversity, Equity & Inclusion** – A designated team placed strategically throughout the community, working alongside and embedded within organizations and state agencies representing under-represented populations. The team will liaise with employers to expand RAP opportunities and create Individualized Resource Teams (IRTs) to facilitate continued RAP development and talent pipeline connections.
- **Public Sector Apprenticeships** – A team of public agency representatives dedicated to the development of Registered Apprenticeship programs across state agencies.

- **“Ready to Go” RAPs with Online Customization System** – An online system will allow employers to choose the work process and RTI provider/outline per RAP, providing for customization when necessary.
- **Career Pathway Match-Making System** – This helps users create a pathway of existing options, from job shadowing, internship, pre-apprenticeship, and leading to RA within that career choice.
- **Third Party Credential Search** – A data system to house all apprentice certifications as they progress through related certifications, pre-apprenticeship and RA certifications.
- **K-12 National Apprenticeship Week curriculum** – Development of lesson plans, for teachers and counselors, to use for discussion and awareness of the different opportunities to career development and career readiness.
- Automate current **Talent Pipeline Referral System** to reduce lag time for apprentices qualified for inter-agency supportive services.
- **Unify Information Technology (IT) Systems** - Unify all state agencies working on RA projects under one single CRM system that monitors interactions with employers and allows partners to track the progress of RAPs throughout the development process. Integrating the current talent-pipeline referral system and providing more real-time follow-through with automated data triggering is also a proposed project outcome

Moving away from working a grant via a siloed approach has helped to improve the state’s focus on integrating, business outreach and assistance with its partners across Idaho, ensuring identification and development of career pathways and industry-recognized credentials with each new RA developed. The state’s workforce development system prioritized supporting its key industries’ growth and technological capabilities through the establishment of a trained workforce throughout Idaho. Through the cross training of workforce, education, community and business sectors, *ApprenticeshipIdaho* partners serve to improve the state’s RA capacity, with many individual and employer customers benefitting from this “tag-teaming” of resources, which spur its continued success.

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).

As noted in the **Adult, Dislocated, and Youth Activities** section, *a. General Requirements, 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*, Idaho’s Policy for WIOA Eligible Training Providers Idaho Eligibility Criteria and Procedures (Adopted 04-07-2020) is one of several policies currently undergoing review and slated for revision. The new and revised policy will incorporate guidance from TEGl 08-19 and TEGl 08-19, Change 1 to address multiple items, including the incorporation of Registered Apprenticeship programs. In the meantime, the state is implementing the ETP processes/requirements as laid out in this state plan modification, alongside Idaho's existing policy. The narrative below outlines the state’s current policy and process as it

relates the eligible training providers in Idaho. Once the policy is updated and addresses its current areas of need, it will be incorporated in the next version of Idaho's Combined State Plan.

The Workforce Innovation and Opportunity Act (WIOA) requires states to approve training providers before funds can be used to pay for occupational training. The Governor (via the Idaho Workforce Development Council) is charged with developing the process for determining how training providers may qualify for inclusion on Idaho's Eligible Training Provider List (ETPL). The Idaho Department of Labor (as the State Administrative Entity under WIOA) is responsible for implementing these procedures and maintaining the ETPL.

Previous to 2020, 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, the State did collect full data sets for PY19 and PY20 and provided performance reports to USDOL. For both program years, there continue to be significant inadequacies in the reporting of social security numbers for non-WIOA participants. The Workforce Development Council has been unable to use the data to set performance metrics for continued eligibility and thus the ETP Policy has not yet been fully updated to shift away from alternate criteria. The Workforce Development Council, State Board of Education and Idaho Department of Labor are working with the Idaho Transportation Department to establish a data sharing agreement that will enable participants without social security numbers to be matched against drivers license data to access the SSN.

The Workforce Development Council would like to share that Idaho's providers are increasingly reluctant to stay on the ETP due to the requirement to provide social security numbers for students. Educational entities do not collect this information and while they have made good efforts to do so, they have been communicating with the Executive Director intentions to not renew. As Idaho has few training providers to start with, this may cause the Workforce Development Council to direct all WIOA training funds to on-the-job training and utilize a state program (www.idaholaunch.com) for short-term skills training. We are concerned about the impact on the measurable skills gain performance metric if non-WIOA funded training cannot be used to meet MSG.

WIOA Eligible Training Providers Idaho Eligibility Criteria and Procedures Adopted 04-07-2020

The text below includes the policy itself along with screenshots from the system that providers are directed to apply in to confirm that all criteria are collected in alignment with WIOA statute.

Eligible Providers of Training Services -

Subject to meeting federal and state eligibility criteria, WIOA eligible training providers may include:

- Post-secondary education institutions;
- Other public or private providers of training, which may include joint labor- management organizations and eligible providers of adult education and literacy activities under WIOA title II if such activities are provided in combination with occupational skills training; and

- Community Based Organizations (CBOs) or private organizations of demonstrated effectiveness that provide training under contract with the Idaho Workforce Development Council.

U.S. Department of Labor Registered Apprenticeship programs are automatically eligible training providers under WIOA without regard to federal or state eligibility criteria. The Idaho Department of Labor reaches out to RA programs on an annual basis to determine if the programs would like to opt in to participate in the program. If an RA program opts for inclusion, they may complete the program information in IdahoWorks and are then automatically approved without applying any other eligibility criteria described below.

Eligible Programs of Training Services

The Eligible Training Provider List is composed of eligible training programs. Both training providers and their individual programs must meet eligibility standards. A program of training services is defined as one or more courses or classes, or a structured regimen that directly leads to employment in an in- demand occupation. The training must lead to:

- a recognized postsecondary credential,
- a secondary school diploma or its equivalent, or
- a distinct measurable skill gain toward such a credential or employment.

These training services may be delivered in person, on-line, or in a blended approach; however, the training provider must provide physical facilities and/or tools to provide a high-quality experience in meeting instructional and skills assessment needs.

Training Service Exceptions to Eligible Training Provider List

Training services that are not subject to the requirements of the eligible training provider provisions are:

- On-the-job training; customized training; incumbent worker training; transitional employment; or
- The circumstances described at WIOA sec. 134(c)(3)(G)(ii), where the Workforce Development Council determines that:
 - There are insufficient providers, or
 - There is a training services program with demonstrated effectiveness offered in the local area by a community-based organization or other private organization to serve individuals with barriers to employment, or
 - It would be most appropriate to award a contract to an institution of higher education or other eligible provider of training services in order to facilitate the training of multiple individuals in in-demand industry sectors or occupations, and such contract does not limit customer choice.

Note: The Eligible Training Provider List is used only to provide occupational skills training services. Basic skills training, “soft” skills training, or other workforce preparation activities do not train individuals for a particular occupation. Additionally, the following are not considered occupational skills training:

- Workshops or seminars provided by organizations not registered with the Idaho State Board of per year are not considered occupational skills training
- Intensive review courses as instruction for test preparation
- Continuing education courses for those with existing occupational skills
- Short-term certificates that are only one component of the typical requirements for a job such as CPR, OSHA, WorkKeys, Food Handler Certificates, and basic computer training.

As part of a WIOA participant's individualized employment plan, career planners may pay for these activities as career services separate from or in addition to occupational skills training.

Types of Eligibility

WIOA provides for *Initial Eligibility* and *Continued Eligibility*. Initial eligibility is for new programs who upon approval receive eligibility for one year. Continued Eligibility is for a biennial (every other year) review and renewal of programs having completed initial eligibility.

Note: The criteria provided below for both initial and continued eligibility are still considered alternate criteria in Idaho. The state is currently collecting data that will allow the transition to be finalized as the state anticipates setting thresholds for factors related to WIOA performance indicators.

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 institution specific data elements in IdahoWorks as directed by the Idaho Department of Labor.

Note -These data elements include all of the required criteria listed in Attachment III of TEG 8-19. See examples of screenshots below.

- 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 listed in Appendix A. WIOA participants will be encouraged to select training for an occupation that pays at least \$12 per hour.

Note: Appendix A is updated annually in July by the Workforce Development Policy Committee of the Idaho Workforce Development Council.

- 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.

Note: WIOA participants will be encouraged to select high quality training that leads to an industry- recognized postsecondary credential and is available free of charge or at low cost to participants.

*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.

- Provide the required program specific data elements in IdahoWorks as directed by the Idaho Department of Labor. *Note -These data elements include all of the required criteria listed in Attachment III of TEGL 8-19. See examples of screenshots below.*
- Providing a Program Synopsis, which is a brief description of the training program no more than 5,000 characters.
- Information regarding WIOA performance indicators. *(See screenshot from guidance manual for providers below); and*

Program Performance	
Begin Date	Enter the program begin date or
End Date	Enter the program end date in mm / dd/ yyyy format
Number Participated	Number of students participated/enrolled in the program
Number Completed	Enter number of students who completed the program.
Completed Percent	Display
Number Employed After Leaving the Program	(Text) Example: Idaho Office of the State Board of Education.
Employed Percent	Display
Median Hourly Wage at Placement	(Text) Example: Idaho Bureau of Occupational Licenses for Barber and Cosmetology Services Licensing Board.

- Information regarding the provider’s relationship with businesses. *(Screenshot from guidance manual for providers).*

✓ Are you in any partnership(s) with business?	(Drop-down) Select Yes or No.
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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 ETP procedural requirements, 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 and confirmed by the Idaho State Board of Education.

Note – These programs are subject to the State Board of Education’s requirements which meet initial eligibility requirements when aligned to an in-demand occupation. If their information is not already in IdahoWorks, the career planner and/or administrative entity representative works with them to ensure all the required information is entered before issuing a voucher.

- 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 WIOA performance data (*See screenshot above*) and cost information in a timely manner, in accordance with the annual deadlines set by the Idaho Department of Labor.

Note – This includes updating their program information in IdahoWorks in addition to submitting performance data as outlined in the data sharing agreement.

Examples include:

-Addressing access to training services throughout Idaho, and

<input checked="" type="checkbox"/> Training Services Delivered By: (check all that apply)	(Checkboxes) Check all that apply: <ul style="list-style-type: none"> Online with a browser Directly on a computer Onsite at our location
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-The ability to provide physically and programmatically accessible trainings as noted in the screenshot below.

<input checked="" type="checkbox"/> Do you provide access to training for individuals who are employed?	(Drop-down) Select Yes or No.
<input checked="" type="checkbox"/> Do you provide access to training for individuals with barriers to employment?	(Drop-down) Select Yes or No.

- 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.

Programs that were exempt from Initial Eligibility criteria:

- US Department of Labor 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 state's ETP requirements, especially providing information for performance reporting; however, they are not required to do so.
- Public Postsecondary Academic Programs will be removed from the Eligible Training Provider list if a WIOA participant has not been enrolled in the training in the past 12 months. These programs can be added back to the list per the Initial Eligibility criteria above on an as-needed basis.
- Out-of-State Providers will be independently verified against the respective state's ETP list.

Denial or Termination of Eligible Training Provider State

Note – The reasons listed below are what the state considers to be a substantial violation of the policy.

A training provider or program may be denied initial or continued eligibility for the following reasons:

1. Required information was not provided correctly or in a timely manner.
2. The training program does not support the occupations in demand in Idaho and/or does not meet minimum entry-level wage criteria.
3. The training program does not meet the WIOA definition of training services, which is a program of one or more courses or classes or a structured regimen that directly leads to employment in an in-demand occupation. The training must lead to:
 - a. a recognized postsecondary credential,
 - b. a secondary school diploma or its equivalent, or
 - c. a distinct measurable skill gain toward such a credential or employment.
4. The training program does not provide a high-quality educational experience in meeting instructional and assessment needs. (Could be evidenced by lack of regional or national accreditation, lack of industry endorsement, lack of skills gain measured by assessments, lack of job placement, a high dropout rate and/or high student loan default rate)
5. The training provider has not maintained required licenses and certifications or is found to be noncompliant with the training provider's assurances or certifications.
6. The training provider does not comply with the WIOA regulations, or any agreement executed under the WIOA.

Providers who apply will be notified if the provider does not meet the compliance standards. Each provider will be notified of the status of each requested program.

Formal Hearing-Appeal

A training provider whose program is denied from the ETP or is deemed ineligible, has the option to submit a written or email appeal to Idaho Department of Labor within 14 business days after receiving notification. The request for appeal must include the following: name of training provider, training program(s) impacted, the reason for the appeal (i.e. grounds), training provider point of contact phone and email, and signature of training provider representative.

Written appeals can be mailed to:

Appeals Bureau, Idaho Department of Labor, 317 W. Main Street, Boise, ID 83705-0720

Or Faxed to:208-334-6440

Appeals can also be emailed to: WIOAETP@labor.idaho.gov

Regardless of delivery method, the appeal must be postmarked or sent by 5 p.m. on the last day to protest.

As a result of filing an appeal, a telephone hearing may be scheduled in which all interested parties will be invited to participate. The hearing shall include an opportunity for the applicant to submit written and verbal information to the presiding entity. This will be your only opportunity to appeal this issue. If no appeal is filed, this determination will become final and cannot be changed. If you have questions about this determination or about filing an appeal, please contact the ETP Program Specialist by email at WIOAETP@labor.idaho.gov.

The presiding entity will issue a decision within 60 calendar days from the date the hearing takes place. The decision of the presiding entity shall be final.

APPENDIX A - Idaho Occupations in Demand – Amended 4/19/2022

Appendix A is updated annually by the Workforce Development Policy Committee in July.

Methodology

The Idaho Department of Labor's labor market information unit has developed a dynamic web tool that uses quantifiable information to identify in-demand occupations and is augmented with projected growth and total annual openings (based on both projections and real-time job postings), wage information and education and training requirements. The list can be filtered by sub-region of the state, typical education requirement and STEM designation.

This list may be found online at: [Occupations-in-Demand](#).

To be included on the Eligible Training Provider List, programs of training must lead to one or more of the occupations when the following filters have been applied:

1. The tab must be set to "In-Demand Occupations".
2. The "Area Selection" should be set to the region where the training is being provided.
3. The "Typical Education Requirement" should be set such that "No formal educational credential, Bachelor's degree, Master's degree, and Doctoral or professional degree" are not selected.
4. The "Average Hourly Wage" must be set to \$12 per hour.
5. The "Total Annual Openings" must be set to 20.
6. The "Projected Growth Rate" must be set to 0 or higher.

SOC Code	Title	Type of Education Requirement	2019 Employment	2024 Employment	Average Hourly Wage	Average Annual Wage	Projected Growth Rate	Projected Growth	Total Annual Openings	Job Postings (2021)	Occupational Title
11-9075	Transportation, Storage, and Distribution Managers	High school diploma or equivalent	641	650	\$22.22	\$47,214	0.0%	32	32	211	Area Selected: Idaho
11-9011	Farmer, Rancher, and Other Agricultural Managers	High school diploma or equivalent	8,839	9,971	\$31.22	\$64,722	12.9%	1,142	1,280	140	Typical Education Requirement: High school diploma or equivalent
11-9091	Food Service Managers	High school diploma or equivalent	1,272	1,772	\$22.61	\$47,040	3.9%	140	200	1,122	STEM Selection: <input checked="" type="checkbox"/> No formal education is required <input type="checkbox"/> High school diploma or equivalent
11-9053	Trucking Managers	High school diploma or equivalent	267	282	\$26.42	\$54,862	5.6%	3	47	44	Average Hourly Wage: 30
11-9161	Property, Real Estate, and Community Association Managers	High school diploma or equivalent	1,311	1,392	\$26.24	\$54,522	5.9%	202	162	222	Total Annual Openings: 20
11-9173	Child, Youth, and Family Social Workers	High school diploma or equivalent	1,171	1,272	\$24.30	\$50,520	8.6%	36	57	107	Projected Growth Rate: 0.0%
11-9152	Tax Preparers	High school diploma or equivalent	441	504	\$22.95	\$47,544	14.3%	22	34	112	
11-9121	Computer Network Support Technicians	Associate's degree	360	366	\$24.24	\$50,304	17.2%	16	27	149	
11-9132	Computer User Support Specialists	Some college, no degree	1,099	1,444	\$18.26	\$37,764	12.2%	441	551	401	
11-9144	Installation, Maintenance, and Repair Workers	Associate's degree	1,271	1,244	\$18.26	\$37,764	-0.4%	140	161	21	
11-9111	Mechanical Engineers	Associate's degree	150	226	\$22.22	\$46,209	10.0%	27	35	31	
11-9124	Civil Engineering Technicians	Associate's degree	261	261	\$23.09	\$48,275	0.0%	14	16	34	
11-9123	Electrical and Electronics Engineering Technicians	Associate's degree	367	1,158	\$22.07	\$45,900	19.0%	159	167	152	
11-9126	Industrial Engineering Technicians	Associate's degree	169	154	\$22.22	\$46,209	-8.2%	36	22	149	
11-9122	Surveying and Mapping Technicians	High school diploma or equivalent	274	303	\$22.46	\$46,712	5.3%	2	21	45	
11-9136	Collection and Engineering Technicians and Technicians	Associate's degree	147	164	\$20.82	\$43,312	12.2%	14	22	16	
11-9135	Agricultural and Food Science Technicians	Associate's degree	205	440	\$21.22	\$44,120	12.0%	11	36	10	
11-9121	Chemical Technicians	Associate's degree	102	161	\$21.22	\$44,120	11.2%	16	36	10	
11-9144	Environmental Science and Protection Technicians, Excl.	Associate's degree	120	411	\$21.22	\$44,120	12.2%	10	29	10	
11-9111	Market Technicians	Associate's degree	362	464	\$21.22	\$44,120	11.1%	112	11	4	
11-9139	Health, Physical, and Fitness Science Technicians, Excl.	Associate's degree	401	401	\$21.22	\$44,120	0.0%	22	31	141	
11-9112	Retail and Wholesale Sales Associates	High school diploma or equivalent	1,546	2,267	\$17.74	\$36,864	11.2%	201	126	167	
11-9114	Community Health Workers	High school diploma or equivalent	320	360	\$21.22	\$44,120	10.0%	40	54	25	
11-9111	Paralegals and Legal Assistants	Associate's degree	1,201	1,412	\$22.22	\$46,209	18.0%	140	212	161	

The following “career pathway” programs are approved statewide regardless of where they appear on the regional lists:

- Certified Nurse Assistant
- Related training for Electrical, Plumbing and HVAC apprenticeship programs
- Registered Nurse
- Massage Therapy
- Software Developer

A training provider may request review, by the Policy Committee, if the occupation their program prepares individuals for fall outside this policy. They must provide a compelling case as to why the program should be added based on documented demand for individuals with the skills and certifications delivered through the program. The Policy Committee will review the request against available real-time labor market information and make a determination. If approved, the Policy Committee will provide a letter stating such to be attached to the application. If denied, no further recourse is available.

The request must be sent (electronically or by mail) to the Executive Director of the Workforce Development Council at the address found on www.wdc.idaho.gov. Requests that are received 7 or more days prior to the next regularly scheduled Policy Committee meeting will be reviewed at that meeting. If there are fewer than 7 days until the next meeting, it will be reviewed at the following meeting.

The request should include the following information:

- Name of Provider
- Brief Description of Program
- Documented demand for the program by local employers (i.e. letters stating that employers hire from the program, information from the Idaho Occupations In-Demand tool that shows regional demand, other cited data sources that show demand for the occupation). Information provided must be clear, concise and compelling.

The Policy Committee will consider the following, at a minimum, in making a determination:

- Real-time labor market analysis of the occupation through tools such as Help Wanted Online, Burning Glass Labor Insight, EMSI Analyst.
- Regional wage data.
- Whether the occupation is part of a career pathway that leads to additional in-demand, high wage occupations.

If the Policy Committee approves the request, the occupation will be added to the list of additional statewide occupations above.

4. 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 funded by the Adult Formula program

The Idaho policy for adult program eligibility and priority is located here (link): 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 data to ensure program and state compliance for WIOA priority of service of Title IB enrollments.

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

Local workforce areas, with the approval of the Governor, may transfer up to 100 percent of the Adult Activities funds for expenditure on Dislocated Worker Activities, and up to 100 percent of Dislocated Worker Activities funds for expenditure on Adult Activities.

The WDC reserves the right to adjust the funds distributed to Service Delivery Areas, within a single Local Area, in or around December and March of each program year. Adjustments will be made based on an SDA's enrollment and expenditure levels compared to the planned levels within their annual agreement. Enrollment or expenditures 10 percent under planned levels will trigger the WDC to consider adjustments. The WDC will consult with the Administrative Entity and service provider to address participant needs and prevent underspending before shifting funds.

c. WITH RESPECT TO YOUTH WORKFORCE INVESTMENT ACTIVITIES AUTHORIZED IN SECTION 129 OF WIOA—

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

- 1. Identify the State-developed criteria to be used by local boards in awarding grants or contracts 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 or contracts.[11]*

[11] 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.
- f. Effectiveness in serving employers.

2. 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, any 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 resurgence in the economy since the peak of the pandemic, 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.

However, later in PY21, the council will allow the six Service Delivery Areas across the state to enroll in-school youth in their individual Summer Youth Work Experience projects designed to boost youth employment opportunities. WIOA-eligible in-school youth will only be allowed to participate in this project – the state’s emphasis on serving out-of-school youth will not change with this slight modification. Project staff will have undergone training on how to work with in-school youth so as not miss any opportunities to serve youth who may benefit from this project.

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 council will be reviewing and updating the policy to determine if additional incentives may be incorporated as part of the state's offerings. The current policy follows on the next page.

WIOA Youth Program Incentives

Purpose: Revise Youth Program Incentives to comply with WIOA.

WIOA allows for 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 is made a part of the participant's individualized assessment and service strategy. 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.

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. Follow-up incentives are established to only help complete predetermined program 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 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
 - 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; 6-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. \$200 for obtaining employment.
- b. \$300 for retaining the same position/employer for 6 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 measurable skill gain verified by the employer/worksites, based upon a positive employer evaluation which 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. \$150 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.

- a. **Secondary:** transcript or report card for 1 semester, or
- b. **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. \$300 incentive for a youth's successful completion of a WEX/Internship - all activities required for participation. This includes pre- and post-orientations, workshops, fulfilling WEX requirements, meeting all established program expectations, and positive successful employer evaluation report(s).

E. \$100 Perfect Attendance incentive for youth participating in any work-based learning activity. Youth must have:

- a. No unexcused absences.
- b. No more than a single tardy of less than 15 minutes.
- c. Includes attendance at any required pre-/post-work orientations/job search workshop.

F. \$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.

G. \$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 which 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.

H. \$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 that are based on industry skills standards and certification requirements.

3. Describe how the state will ensure that all 14 program elements described in WIOA section 129(c)(2) are made available and effectively implemented, including quality pre-apprenticeship programs under the work experience program element. [12]

[12] 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 which 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 (which includes access to apprenticeship prospects and multiple options for work experience) ; 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 which ensures 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, including their progress toward the achievement of goals, objectives, expenditure rates, service levels, and other process and outcome measures.

4. 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). If the state does not have a policy, describe how the state will ensure that local areas will have a policy for these criteria.

The state Workforce Development Council approved the following criteria for 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. 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 and provide the state policy for determining whether a youth is attending or not attending school.

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. If using the basic skills deficient definition contained in WIOA Section 3(5)(B), include the State definition which must further define how to determine if an individual is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society. If not using the portion of the definition contained in WIOA Section 3(5)(B), indicate that is the case.

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).)*
- 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).)*
- 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).)*

1. Any public comments will be included in the Appendices.

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

3. 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. Also, WIOA and its regulations clarify that awarding a grant on a competitive basis does not apply to the design framework component where these services are provided by the grant recipient/fiscal agent. 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 Disability Employment Initiative 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 requirements for infrastructure cost sharing contributions are applicable to WIOA local areas. Idaho officially consists of two local areas under WIOA – East Central Idaho, also known as Service Delivery Area 6 or Region 6, and the Balance of State, consisting of Regions 1-5. The Workforce Development Council, as the WIOA State Board, provides the policies to the local areas and the Council, acting as the local board for the two areas, is also responsible for implementing these requirements. In compliance with WIOA Sec. 121(b)(1)(A), 20 CFR 678.420, and 678.510, detailed One-Stop partner roles and resource contributions are outlined in the MOUs for each local area of the state with a Comprehensive One-Stop Center and may be found here:

- North Central Idaho ([link](#))
- Eastern Idaho ([link](#))

In accordance with the Statewide Idaho American Job Center Network MOU ([link](#)), Idaho One-Stop partners will be responsible to provide available career services in a non-discriminatory and universally accessible manner, provide referrals to system partners, serve populations with multiple barriers to employment, support the cross training of partner agency staff to ensure familiarity with and representation of all programs, participate as a member of the WIOA Advisory Group, and share in the equitable and proportionate share of their respective American Job Center operational costs that benefit their program(s) participants.

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 2020-2023 WIOA Combined 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 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 – Section 9: Occupation Skills Training/OJT ([link](#)).

Idaho maintains an extensive Eligible Training Provider List ([link](#)) 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 which 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 and recently submitted the required PY20 ETP reporting data, receiving recognition from USDOL for being the first state to do so in the region.

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 will carry out a review of local applications submitted under Title II in the spring of 2022 for the upcoming FY2023. 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. With this coming year's funding cycle (FY2023) 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 – Executed Idaho AJC Network MOU ([link](#)).

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:

- 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;*
- 2. Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;*
- 3. Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;*
- 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.**
- 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; and*
- 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.**
- 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.*

Waiver Request –

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 WIOA 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 nine Idaho Department of Labor offices serve as the state's American Job Centers offering the full range of workforce development services, and dozens of mobile locations across the state expand access into rural areas to connect citizens far from the AJCs to workforce 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;

This waiver allowing a single statewide regional planning structure has allowed for an average annual increase in training opportunities for more adults, dislocated workers and at-risk youth, and has helped 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. The strengthened administrative structure under the waiver has assisted Idaho to minimize disallowed costs, further enabling the redirection of funds from service provider and administration to direct participant training and support.

E1) As noted earlier in this section of Idaho's Combined State Plan, Idaho is comprised of two local areas – the Balance of State and eastern Idaho – a structure established since 2005. Under this waiver, the state Workforce Development Council serves as a statewide local board for both local areas, functioning as the planning structure outlined earlier. Prior to submission of this plan modification and previous versions, the state and the council reached out to the East Central Idaho Elected Official Consortium and its WIOA representatives, East Central Idaho Planning and Development Association (ECIPDA) to discuss any potential changes to this structure and/or affirm the existing relationship. Since the structure's establishment, ECIPDA and those it represents have unanimously supported this waiver and its objectives. Attached is the MOU (updated on February 27, 2020) between ECIPDA and the Workforce Development Council outlining the roles each have in the statewide and local governance of Idaho's workforce development system.

In addition, the Workforce Development Council itself includes several elected officials as part of its membership. Two serve as local elected officials, and two others are state representatives – one representing state House and the other the state Senate. Each member represents a different area of the state and bring a local perspective to the issues affecting workforce matters across the state. Currently, the local elected official representing cities is from the eastern Idaho local area.

E2) Funds to the local areas are distributed based on the state's [WIOA Local Board Funding Distribution Policy](#) (link), which outlines how the state allots funds to each local area.

Idaho's waiver request was posted on the Idaho Workforce Development Council's website for comment and review by required parties and the general public. An invitation was personally extended to two influential organizations in the state – the Idaho Association of Cities and Idaho Association of Counties - to provide them the opportunity to review not only this waiver, but the

entire Combined State plan. 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 PY2022-2023 Modified Combined State Plan. The State Workforce Development Council reviewed the request for submission of a waiver and the state plan during its March 16, 2022 meeting. The meeting was announced and opened to the public via a variety of means across the state.

E3) Despite the opportunities presented, no public comments were received regarding this waiver. If the state had received any, they would have been forwarded to the USDOL and included as a modification to Idaho's Combined State Plan. The impact of this waiver on the state's performance will be addressed 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 assurances that:

<i>The State Plan must include</i>	<i>Include</i>
<i>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;</i>	Yes
<i>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;</i>	Yes
<i>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;</i>	Yes
<i>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);</i>	Yes
<i>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;</i>	No
<i>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;</i>	Yes
<i>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);</i>	Yes
<i>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;</i>	Yes
<i>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;</i>	Yes
<i>10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.</i>	Yes

<i>The State Plan must include</i>	Include
<i>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);</i>	Yes

ADULT PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);*
- Employment (Fourth Quarter after Exit);*
- Median Earnings (Second Quarter after Exit);*
- Credential Attainment Rate; and*
- Measurable Skill Gains*

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);*
- Employment (Fourth Quarter after Exit); and*
- Median Earnings (Second Quarter after Exit)*

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit);*
- *Median Earnings (Second Quarter after Exit); and*
- *Credential Attainment Rate*

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	78.6	81.4	78.6	81.4
Employment (Fourth Quarter After Exit)	80.4	80.4	80.4	80.4
Median Earnings (Second Quarter After Exit)	\$7,025	\$7,025	\$7,025	\$7,025
Credential Attainment Rate	72.2	72.2	72.2	72.2

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Measurable Skill Gains	57.9	57.9	57.9	57.9
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹ "Effectiveness in Serving Employers" is still being developed and this data will not be entered in the 2022 State Plan modifications.

DISLOCATED PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit);*
- *Median Earnings (Second Quarter after Exit);*
- *Credential Attainment Rate; and*
- *Measurable Skill Gains*

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit); and*
- *Median Earnings (Second Quarter after Exit)*

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit);*
- *Median Earnings (Second Quarter after Exit); and*
- *Credential Attainment Rate*

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	80.1	80.1	80.1	80.1
Employment (Fourth Quarter After Exit)	78.4	81.0	78.4	81.0

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Median Earnings (Second Quarter After Exit)	\$7,988	\$8,016	\$7,988	\$8,016
Credential Attainment Rate	69.7	72.0	69.7	72.0
Measurable Skill Gains	60.4	60.4	60.4	60.4
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹ "Effectiveness in Serving Employers" is still being developed and this data will not be entered in the 2022 State Plan modifications.

YOUTH PROGRAM PERFORMANCE INDICATORS

Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as "baseline" indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A "baseline" indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, "baseline" indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as "baseline" based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit);*
- *Median Earnings (Second Quarter after Exit);*
- *Credential Attainment Rate; and*
- *Measurable Skill Gains*

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit); and*
- *Median Earnings (Second Quarter after Exit)*

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- *Employment (Second Quarter after Exit);*
- *Employment (Fourth Quarter after Exit);*
- *Median Earnings (Second Quarter after Exit); and*
- *Credential Attainment Rate*

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the state indicators. Please identify any such state indicators under Additional Indicators of Performance.

Performance Indicators	PY 2022 Expected Level	PY 2022 Negotiated Level	PY 2023 Expected Level	PY 2023 Negotiated Level
Employment (Second Quarter After Exit)	73.5	75.0	73.5	75.0
Employment (Fourth Quarter After Exit)	77.9	78.6	77.9	78.6
Median Earnings (Second Quarter After Exit)	\$4,350	\$4,350	\$4,350	\$4,350
Credential Attainment Rate	49.7	51.5	49.7	51.5
Measurable Skill Gains	50.0	50.0	50.0	50.0
Effectiveness in Serving Employers	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹	Not Applicable ¹

¹ "Effectiveness in Serving Employers" is still being developed and this data will not be entered in the 2022 State Plan modifications.