

Idaho WIA Combined State Plan (modification) for PY2026 and PY2027

Title I-B

III. 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.

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 and policy 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.

The state’s policy criteria for local area designation and appointment of local board members have undergone several changes since WIOA’s inception. The table below shows the breakdown of this policy’s initial development, modification, and eventual approval by the state’s Workforce Development Council. The local area designation policy has remained the same since its 2022 revision.

Policy/Modification	Action	Public Comment Period	Local Officials notified	Final Approval
Initial Policy	Presented to WDC in July 2015, later modified and approved by Governor	Posted from Aug-Sept. 2015. No comments received	County clerks & local mayors contacted via ID Assoc. of Cities; ID Assoc. of Counties	Approved by WDC on Oct. 2015.

Policy Modification	Reviewed by WDC early in 2020.	Posted March 2020. No comments received	See above	Approved by WDC on April 2020
Policy Modification	State staff revised to incorporate newly required changes imposed by USDOL.	Posted February 2022. No comments received	See above	Approved by WDC on June 2022.

The state’s local areas have each 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.

[Local Area Designation and Policy](#)

(C) *Provide the appeals process and policy 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.

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.

a. 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
514 W. Jefferson Street, Ste. 131
Boise, Idaho 83702

The Executive Director shall promptly acknowledge receipt of the appeal.

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 calendar 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.

a. Appeal to U.S.DOL

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
514 W. Jefferson Street, Ste. 131
Boise, Idaho 83702

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

- (D) *Provide the appeals process and policy 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 policies for use by all WIOA service providers and they may be found on the Council's web site. Statewide policies for Governance, WIOA Title I-B, and One-Stop System reside on the Council's website via the following link - [Idaho WIOA Resources & Policies](#)

- (B) *Describe how the State intends to use Governor's set aside funding for mandatory and discretionary activities, including how the State will conduct evaluations of Title I Adult, Dislocated Worker, and Youth activities.*

GOVERNOR'S RESERVE FUND-15% SET-ASIDE PLANS

WIOA Title I-B 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 on effective outreach and partnerships with business and service delivery strategies and promising practices to serve workers and job seekers;
 - Information on 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 in providing 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 in carrying out the regional planning and service delivery efforts;
- Assisting local areas by providing information on and support for the effective development, convening, and implementation of industry and sector partnerships;
- Providing technical assistance to local areas that fail to meet performance accountability measure;
- Carrying out monitoring and oversight of activities for services to youth, adults, and dislocated workers;
- Providing additional assistance to local areas that have a high concentration of eligible youth; and
- Operating a fiscal and management accountability information system.
- Supporting the state board as it implements workforce activities across the state.

Dissemination of Information

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

Assisting in the Operation of the One Stop System

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

High-Concentration of Eligible Youth

The State reserved funds to serve high concentrations of eligible youth needing assistance throughout the state. Funds are distributed based on areas demonstrating a need for additional monies. From PY22 through PY24, these funds have since been directed to target services to justice-involved youth across the state.

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

Evaluations

The State implements evaluations to determine impacts upon the program when changes may potentially affect participation or performance outcomes. This past year, the state conducted an evaluation that sought to answer whether the change in the state's service delivery model affected individuals' potential enrollment in the WIOA Adult program. A summary of these results were included in the state's [PY24 WIOA Annual Narrative Report](#).

- (C) *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.*

The Idaho Department of Labor's Workforce Program Administration Bureau serves as the state Dislocated Worker (DW) Unit with responsibility for the coordination of Rapid Response/ Dislocated Worker services within the department and other state and local community resources. The department's Rapid Response funded activities involve - and are closely coordinated with - the Workforce Services Division, Unemployment Insurance Benefits Bureau, Research and Communications Bureau, Equus (the state's WIOA DW service provider), 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 (TAA) and veteran services.

Rapid Response interventions, implemented by the department's Workforce Programs Administration Bureau, and coordinated with the local AJC locations, incorporate all these entities referenced above to

ensure workers impacted by mass layoffs and closures are seamlessly transitioned to One-Stop activities. The department coordinates with labor unions and associations in arranging services for dislocations involving organized labor. Various community organizations also play a significant role in helping 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 intervention services and helps to develop response plans for worker dislocations. AJC staff also assist 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 closure(s) and mass layoffs to the Idaho Department of Labor, which in turn distributes the information to the department's administrators and state agencies participating in the One-Stop system. The Workforce Administration Bureau, local AJC management, or program 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, local mobile units could establish temporary re-employment centers onsite, staffed by AJC personnel to present information about career and training services 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 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-B 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 an impacted 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 allowable 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 various state or federal resources that are available to offer support in these instances.

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. Rapid Response team activities are also tracked in *IdahoWorks*.

(D) *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/or 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 for coordinating the responses of Idaho's state agencies. In an 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. The Idaho Department of Labor participates in all levels of agency coordination, as appropriate, to ensure critical functions are operating and assistance is available to those in need. These functions include Rapid Response and Disaster Unemployment Insurance benefits.

The Idaho Department of Labor's Workforce Programs Administration Bureau 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 (IDEOC), 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 veteran's services. The team may also include representatives from organized labor (if it is affected)

and other local entities that may meet the needs of the impacted workforce.

Disaster Unemployment Insurance benefits are 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 have a request for a National Dislocated Worker Emergency Grant submitted within 15 business days. After the initial provision of onsite Rapid Response services under WIOA Title I, the state staff will consult the Rapid Response team for recommendations to include in the request for a National Dislocated Worker Emergency Grant.

- (E) *Describe how the State provides early intervention (e.g., Rapid Response) and ensures the provision of appropriate career services to worker groups on whose behalf a Trade Adjustment Assistance (TAA) petition has been filed. (Section 134(a)(2)(A) and TAA Section 221(a)(2)(A).) This description must include how the State disseminates benefit information to provide 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 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 and how the state will ensure the provision of appropriate career service to workers in the groups identified in the petition (TAA Sec. 221(a)(2)(A)).*

WIOA Dislocated Worker and Trade Adjustment Assistance programs are both administered through the One-Stop centers. 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 the event is Trade related, assesses initial community impact, identifies, and includes other partners for Rapid Response assistance and develops integrated service delivery schedules and options to meet the needs of each individual employer and their impacted workers. Rapid Response events may be held in-person and onsite, or via on-line media platforms such as Zoom or Teams meeting. These options allow for a more effective distribution of information, reaching more workers across a broad spectrum of (virtual) locations.

Hard copy or electronic informational packets may be distributed to the impacted workers and may include a survey to determine workers' interests and to use towards the development of a National Dislocated Worker Grant application. 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, and vice versa, effectively eliminating client redundancies and streamlining co-enrollment processes. State workforce policy requires WIOA co-enrollment of TAA recipients whenever the individual is WIOA-eligible and ensures access to WIOA staff or other supportive services.

Although the program has been sunset, current 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 Worker 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.

Following Pillars I and II of USDOL's America's Talent Strategy, Idaho's OJT Training contracts are directed at employers who can 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., outreach to sponsors and prospective sponsors, identifying potential participants and connecting them to apprenticeship opportunities).

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, with the team's efforts closely aligning with the pillars outlined in USDOL's America Talent Strategy and shown below. Idaho's advances in Registered Apprenticeship (RA) have shown significant positive results since beginning a concerted effort to do so in 2015. The American Institutes for Research (AIR) and Social Policy Research Associates (SPRA) have both recognized the state's significant efforts. Here is their joint statement acknowledging Idaho's work:

Idaho has shown a 116% increase in all apprentices, a 120% increase in new apprentices, and a 463% increase in new programs from 2015 to 2021. Under the State Apprenticeship Expansion Grant investments, Idaho has seen substantial performance on their grants with 452% of their target goal on their ASE grant and 72.67% of their SAEEI grant (y-t-d). AIR and SPR have found through a state analysis that Idaho has developed

innovations across three of the five expansion elements, including State Leadership and Policy; Outreach and Business Engagement; and Capacity to Develop, Register, and Support Programs.

Overall, registered apprentices have grown from under 1,000 in 2017 to over 3,500 in 2025.

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 U.S.DOL-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 Apprentice Orientation Training System, and the innovative Sponsor Journey Map, a nationally recognized best practice by U.S.DOL/American Institutes for Research for state apprenticeship agencies which guides partners through the RAP development process.

Partnership and Alignment to Support Workforce System Integration (Pillars I, II, and III)- IDOL's alignment with the Apprenticeship Idaho Coalition and other key partners underscores our commitment to integrating apprenticeship with regional and statewide workforce development plans. This coalition facilitates training events and technical assistance, fostering growth and diversification of RAPs. Together with the state's Workforce Development Council, Idaho Division of 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. As needed, the coalition hosts training and technical assistance events for employers, sponsors, and related-training instruction (RTI) providers across the state.

IDOL plans to continue the state's focus on innovating and modernizing its RAP systems through expansion and development of the following projects, which align with one or more the five pillars of America's Talent Strategy:

- **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, Apprenticeship Idaho 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.
- Welcomed the Veterans Chamber of Commers as a member of Idaho's Apprenticeship Coalition to assist in **expanding veteran awareness** of apprenticeships and their benefits.

- **Public Sector Apprenticeships** – A team of public agency representatives dedicated to the development of Registered Apprenticeship programs across state agencies.
- “Ready to Grow” **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.
- In discussions with Idaho Career Technical Education (CTE) towards becoming a **Group Sponsor** for multiple apprenticeship programs across the state.
- 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.
- **Apprenticeship Idaho Funding Committee** - Represents seven different funds that offer support to apprenticeship training programs, and the committee members collaborate on referrals to provide maximum benefit available to sponsors.
- In partnership with the USDOL Women's Bureau, Apprenticeship Idaho hosted the state's second Women in Apprenticeships - **Idaho Women in Advance Manufacturing event**.

Idaho moved beyond a siloed approach and committed to integrating apprenticeship programs with business outreach and partner collaboration, thereby enhancing its workforce development system and supporting key industries. Through the cross training of workforce, education, community and business sectors, *Apprenticeship Idaho* 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).*

Idaho's Policy for WIOA Eligible Training Providers Idaho Eligibility Criteria and Procedures incorporates guidance from TEGl 08-19 and TEGl 08-19, Change 1 to ensure the state's compliance with federal mandates. The state's policy implements the ETP processes and requirements as laid out in this state plan. The [revised policy \(link\)](#) outlines the process as it relates to the eligible training providers in Idaho. This policy shares these processes with the Idaho Launch program, the Workforce Development Council's state training program, to help WIOA staff and prospective customers in their training choice. This was done to ensure the maximum possibility of leveraging both resources to assist customers in achieving their training goal.

(4) Describe how the State will implement and monitor for the Adult Priority of Service requirement in WIOA section 134 (c)(3)(E) that requires American Job Center staff, when using WIOA Adult program funds to provide individualized career services and training services, to give priority of service to recipients of public assistance, low-income individuals, and individuals who are basic skills deficient (including English language learners).

Idaho's Integrated WIOA Priority of Service Policy includes the specific program requirements for the Adult program. 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/justice-involved
 - e. Homeless individuals/runaway youth
 - f. Long-term unemployed (unemployed 27 weeks or longer)
 - 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; (Native Americans/Indians, Alaska Natives, Native Hawaiian, African American, Latino/Hispanic, etc.)

5. Other individuals within these recognized groups:
 - a. Individuals referred by other One-Stop partner programs.
 - b. 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 I-B 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 of 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.

(6) Describe the State's policy on WIOA and TAA co-enrollment and whether and how often this policy is disseminated to the local workforce development boards and required one-stop partners Trade Act Sec. 239(f), Sec. 235, 20 CFR 618.325, 20 CFR 618.824(a)(3)(i).

Co-enrollment with the WIOA Dislocated Worker program is required for all TAA and RTAA/ATAA participants approved for any one or a combination of the following Trade Act services: employment and case management, training, job search allowance, relocation allowances, and wage subsidy for older workers (RTAA/ATAA). A worker enrolled in TAA and/or RTAA/ATAA is eligible for enrollment in the WIOA Dislocated Worker program regardless of when the TAA qualifying layoff took place, (20 CFR 618.325 (a)(1)). This means there is no time limit from when the trade affected employment ended until the DW co-enrollment with the TAA program takes place. The only exception for not co-enrolling with the WIOA DW program is if the DW participant does not meet Selective Service registration requirements. The state provides program and partner staff with a list of allowable dislocated worker documentation and guidance on the selective service verification requirement.

Idaho's policy (see link to policy in the following section) **only** applies to individuals co-enrolled in the DW and TAA programs. All other individuals must follow the state WIOA Dislocated Worker eligibility policy. The state provides monthly calls with providers and partner programs to review various topics, including policies. Approved by the state One-Stop Committee and shared with the Workforce Development Council, the state Administrative Entity has presented the policy during the provider calls as well as during other trainings throughout the year.

(7) Describe the State's formal strategy to ensure that WIOA and TAA co-enrolled participants receive necessary funded benefits and services. Trade Act Sec. 239(f), Sec. 235, 20 CFR 618.816(c)

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, and vice versa, effectively eliminating client redundancies and streamlining co-enrollment processes. The state's [combined TAA/WIOA policy \(link\)](#) on co-enrollment requires WIOA co-enrollment of TAA recipients whenever the individual is WIOA-eligible and receives WIOA staff or other supportive services in addition to the TAA services they may already be eligible to receive.

(8) Describe the State's process for familiarizing one-stop staff with the TAA program. 20 CFR 618.804(j), 20 CFR 618.305

One-Stop 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.

c. **Youth Program Requirements.** *With respect to youth workforce investment activities authorized in section 129 of WIOA, States should describe their strategies that will support the implementation of youth activities under WIOA. State's must-*

(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.⁷ Further, include a description of how the State assists

local areas in determining whether to contract for services or to provide some or all of the program elements directly.

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 and is supported by the Workforce Development Council in its role as the state's local board.

Outcomes

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

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

(2) Explain how the State assists local workforce boards in achieving results for out-of-school and in-school youth. Describe promising practices or partnership models that local areas are implementing and the state's role in supporting and scaling those models within the state for both in-school and out-of-school youth.

Connecting with Youth remains a major emphasis among the State's Combined State Plan partners. Even six years after the pandemic and the state's strong economic recovery, Idaho's job-seeking youth continue to appear at a disadvantage in terms of finding employment. This affects both in- and out-of-school (ISY, OSY) youth throughout Idaho, but it is obviously compounded when the additional barriers encountered by an out-of-school youth come to the forefront.

Since PY2016, the state's Title I Youth program has directed 100 percent of program funds towards OSY. However, in the spring of 2025, the Idaho Workforce Development Council revised its policy to allow for the enrollment of ISY as a means of focusing program services on those youth most at risk while in school. As required under the Act, the council, as a WIOA local board, mandated that at least 75 percent of local Youth program funding be directed towards serving OSY, with the remaining funds dedicated to serving the targeted and eligible ISY.

With this policy in place, the council allowed the state's six Service Delivery Areas to enroll in-school youth beginning the fall of 2025. The state's Administrative Entity provided WIOA Youth program staff training on the enrollment of and how to work with in-school youth so as not to miss any opportunities to serve youth who may benefit from this new initiative. As noted earlier, WIOA-eligible in-school youth with service priority to those targeted groups will be the planned beneficiaries of this new proposal. However, despite the anticipated limited reduction in funding, the state's emphasis on serving out-of-school youth has not wavered.

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 Idaho's 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.
- E) Support development in work-based learning, and innovative programs to drive Idaho's present and future workforce solutions.

Out-of-school and disconnected youth, as well as those in-school youth, will 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, foster/kinship care youth, 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 in or exiting foster/kinship care;
- low-income youth that are pregnant and/or parenting; and
- low-income youth 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 throughout the state. In addition, the State has continued these efforts with the implementation of an incentives policy to encourage overall participant achievement, especially for youth. The Idaho Department of Labor reviewed and updated this [policy \(link\)](#) to incorporate as part of the state's offerings to improve program outcomes. As the state administrative entity, the department has the insight to assess not only the feasibility of the incentives, but also their potential to improve a youth's success.

(3) Describe how the State assists local workforce boards in implementing innovative models for delivering youth workforce investment activities, including effective ways local workforce boards can make available the 14 program elements described in WIOA section 129(c)(2); and explain how local areas can ensure work experience, including quality pre-apprenticeship and registered apprenticeship, is prioritized as a key element within a broader career pathways strategy.

With the support of the Workforce Development Council in its role as a local workforce board, 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. As the grant recipient, the Idaho Department of Labor may provide all youth program workforce investment activities and program elements under this provision and also provide the program's design framework services. The design framework includes intake, assessment, development of an individual's service plan and overall case management - these will determine whether occupational skills are required by the youth, negating the need for procuring the element.

Extensive surveys and communication with other organizations serving youth found that several WIOA youth elements are commonly available in local service areas including: tutoring, alternative school, education concurrent w/work prep, guidance and counseling, financial literacy education, entrepreneurial skills, and transition activities. Because of their availability locally, these services 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 career planning staff provide access and/or referral to any of the elements most appropriate for the eligible youth. The department's service providers have implemented 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 with 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 links with the public, private and non-profit service providers of these elements. These links include arrangements which ensure a regular exchange of information relating to the progress, problems and needs of participants.

Service provider performance is 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.

The WIOA Definition for Youth Needing Additional Assistance *(applicable to both In-School and Out-of-school Youth):*

A 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.

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).)

The comment period for Idaho's Modified WIOA Combined State Plan will be open from February 9, 2026, through March 11, 2026, and posted on the Idaho Workforce Development Council's website. Any comments received during that time will be reviewed by the state. Both comments and responses to the same will be placed on file and made available for review.

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

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

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

The WIOA Youth program design includes intake, assessment, development of an individual's service plan and overall case management. These activities determine the appropriate mix of services for each youth, including assistance with completion of GED, work experience, OJT, occupational skills training, and other elements as appropriate.

Youth with disabilities are a priority group for the WIOA Title I Youth program. In the last program year, more than 33% of the youth served had this employment barrier. WIOA 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.

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](#)
- [Eastern Idaho](#)

In accordance with the [Statewide Idaho One-Stop/American Job Center Network MOU](#), 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 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 U.S.DOL approved (initial) 2024-2027 WIOA Combined State Plan and authorized in WIOA Sec. 107(c)(4). This makes the state Workforce Development Council responsible for the selection of Title I-B 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 the training approach.

Idaho Title I-B programs offer 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: Training Types \(link\)](#).

Idaho maintains an extensive [Eligible Training Provider List](#) 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. The state collects training providers' performance data for federal reporting purposes, having done so successfully since PY22.

WIOA Title I-B program staff 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 2027 for the upcoming FY2028. The Board will be given a presentation about the description of the competitive grant cycle process, including the timeline, and the Board chair will appoint an ad hoc committee to conduct the review. With this coming year's funding cycle (FY2028) for Title II services, the Council will again be included as it participates in the review of next 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 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 – [One-Stop Statewide Memo of Understanding](#).

- 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; 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 most recent data available regarding the results and outcomes observed through implementation of the existing waiver, in cases where the State seeks renewal of a previously approved waiver.

Waiver A. - Allow for a State Board to Act as a Local Board

- (1) *Identify 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*

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) *Describe the actions that the State or local area 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*

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 eight 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) Describe how the waiver will align with the Department's policy priorities

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) Describe the individuals affected by the waiver

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) Describe the processes used to monitor, offer a local board notice, public comment opportunity, and report in the 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.

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, dba ALTURA,

to discuss any potential changes to this structure and/or affirm the existing relationship. Since the structure's establishment, ALTURA and those it represents have unanimously supported this waiver and its objectives. The MOU between ALTURA and the Workforce Development Council outlines 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 brings 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.

Funds to the local areas are distributed based on the state's WIOA Title I-B Formula Funds Distribution Policy, which outlines how the state allots funds to each local area.

Idaho's waiver requests will be posted on the Idaho Workforce Development Council's website for comment and review by required parties and the public. An invitation has been 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 all the waivers contained in the entire Combined State Plan. No local boards are affected by the waiver. All state Workforce Development Council will receive copies of these waivers along with Idaho's PY2024-2027 WIOA Modified Combined State Plan. The State Workforce Development Council's Executive Committee will review these documents on February 12, 2026, with plans for the full Council to review these items during its March 11, 2026 meeting. Meetings for both groups are announced and open to the public via a variety of means across the state.

The comment period for Idaho's Modified WIOA Combined State Plan will be open from February 9, 2026, through March 11, 2026, and posted on the Idaho Workforce Development Council's website. Any comments received during that time will be reviewed by the state. Both comments and responses to the same will be placed on file and made available for review.

(7) Provide the most recent data regarding the results and outcomes from the waiver's implementation (if a waiver renewal)

The primary goal sought by this waiver is to reduce administrative costs and maximize the available money directed to career and training services, including work-based learning, and services to businesses and job seekers. The eventual programmatic outcome results in service to a larger number of participants that would otherwise be served due to higher administrative costs. To maximize resources available for service delivery, the state continues to use the flexibility of this waiver to allow the WDC to serve as the local workforce board. When initially implemented, this strategy saved Idaho's Workforce Investment Act (WIA) program \$1,482,788 by removing the required maintenance of six

local areas throughout the state. These former administrative funds have been utilized as program funds, which allows more participants to be served and allows the state to maintain service levels, despite funding cuts over the years. In today's dollars, the costs easily translate to a programmatic infusion of \$2,476,142 which, in 2025, amounts to just over 34.48% of the state's total WIOA Title I-B allotment from USDOL for PY24.

The single statewide planning structure helps reduce annual overhead, emphasizing spending program funds towards direct training and support of businesses and participants. By strengthening administrative oversight and accountability processes, it has helped significantly in eliminating administrative deficiencies over the years that may have resulted in disallowed costs.

Waiver B. – Waiver of WIOA Section 134(d)(2) and 20 CFR 680.910 to Allow for Post-Exit Supportive Services for Employment Retention

- (1) *Identify 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*

The State of Idaho is requesting a waiver of WIOA Section 134(d)(2) and 20 CFR 680.910, which limit the provision of supportive services for Adult and Dislocated Worker participants to the period of active participation before program exit.

Under current law and regulation, supportive services may not be provided during the 12 months following exit, even when such services are necessary to support employment retention and to ensure a successful transition toward self-sufficiency.

- (2) *Describe the actions that the State or local area has undertaken to remove State or local statutory or regulatory barriers*

No State statutory or regulatory barriers exist at this time that would prevent the provision of supportive services to Adult and Dislocated Worker participants during the post-exit period.

- (3) *Describes the goals of the waiver and the expected programmatic outcomes*

The primary strategic goals supported by this waiver include improving employment retention outcomes, supporting wage progression, and reducing early job loss among Adult and Dislocated Worker participants.

These goals align with Idaho's broader workforce development strategy and performance accountability framework.

- (4) *Quantifiable projected programmatic outcomes resulting from implementation of the waiver.*

If approved, Idaho projects measurable improvements in employment retention and earnings outcomes for Adult and Dislocated Worker participants who receive post-exit supportive services, compared to those participants who do not. By addressing short-term barriers such as transportation, childcare, or other work-related needs, that commonly arise immediately after entering unsubsidized employment, this waiver is expected to strengthen participants' ability to maintain employment and remain engaged in the labor force.

In addition, Idaho's need for this waiver is informed by significant shifts in the populations served under the Adult and Dislocated Worker programs. Since PY17, Idaho has experienced a 508 percent increase in serving individuals with a history of incarceration, a 123 percent increase in serving long-term unemployed individuals, and a 34 percent increase in serving individuals with disabilities. These populations often face greater

barriers to sustained employment, particularly during the critical post-exit period. Allowing limited, targeted post-exit supportive services is intended to help mitigate these challenges and support employment retention for participants with higher support needs.

As a result of waiver implementation, Idaho expects to see improvements in Employment Rate 2nd Quarter After Exit (ER2) and Employment Rate 4th Quarter After Exit (ER4), reflecting stronger short-term and longer-term employment retention for participants receiving post-exit supportive services. Idaho also anticipates positive impacts on median earnings, as improved employment stability supports increased hours, wage progression, and sustained attachment to the workforce.

All outcomes will be tracked annually and used to assess the effectiveness of the waiver and inform future policy decisions

(5) Individuals, groups, or populations benefitting from, or otherwise impacted by, the waiver.

The waiver is expected to primarily benefit Adult and Dislocated Worker participants who have exited the program and entered unsubsidized employment, particularly individuals who require short-term support to stabilize employment during the transition period following exit. This includes participants who are newly employed, entering employment with limited financial reserves, or adjusting to changes in income and work schedules.

The waiver will also benefit individuals receiving public assistance or transitioning off public benefits by providing targeted, short-term supportive services that help mitigate employment disruptions and support sustained attachment to the labor force. By supporting employment retention and wage progression, the waiver is expected to promote greater economic stability and self-sufficiency for participating individuals.

No adverse impacts to other participant populations are anticipated as a result of this waiver.

(6) How the State plans to monitor waiver implementation, including collection of measurable waiver outcome information.

Idaho will implement the waiver through clear state-level policy guidance that defines allowable post-exit supportive service types, establishes duration and dollar limits to ensure services remain short-term and focused on employment retention, and sets documentation requirements that directly link supportive services to retention outcomes.

Monitoring will be conducted through existing state-level oversight and local monitoring processes. Monitoring will include verification of participant need, review of service allowability and reasonableness, and documentation demonstrating that supportive services are necessary to support employment retention and are not otherwise available. Oversight activities will also include reviewing post-exit supportive service provision, analyzing employment retention and wage outcomes for waiver participants, and conducting regular compliance reviews to ensure fiscal integrity.

(7) Assurance of State posting of the request for public comment and notification to affected Local Workforce Development Boards.

Idaho's waiver request is posted on the Idaho Workforce Development Council's website for public comment and review by required parties. The public comment period began on February 9 and will close on March 11, 2026.

No local workforce development boards are adversely affected by this waiver. A copy of the waiver request and the proposed State Plan modification was provided to members of the Idaho Workforce Development Council in accordance with required notification procedures.

Waiver C. – Request for Waiver of “All-Student” ETPL Performance Reporting Program Years (PY) 2024–2027

1) Statutory/regulatory provisions to be waived

Idaho requests a waiver of the requirement to collect and report performance data for all students in each program of study listed on the State Eligible Training Provider List (ETPL), as required by:

- **WIOA Sections 116 and 122**
- **20 CFR 677.230**
- **20 CFR 680.400–680.530**

Under this waiver, Idaho would continue to collect and report all required performance data for WIOA-funded participants; the waiver would exempt providers from reporting outcomes for non-WIOA students in ETPL-listed programs.

Waiver period: PY 2024 through PY 2027.

2) State or local barriers

There are no Idaho statutes or local regulations that prevent implementation of this waiver. Idaho Department of Labor (IDOL) policies are aligned with current federal law and guidance.

3) Background and rationale

Idaho maintains the ETPL within IdahoWorks, supporting consumer choice and workforce alignment statewide. Requiring ETPs to report performance for all students—including those not funded by WIOA—creates operational burdens that have no direct bearing on WIOA accountability and materially reduce provider participation, especially in rural areas and among public community colleges and career-technical programs.

Key Idaho dynamics:

- **Rural access:** Many counties rely on a small number of training providers; if providers withdraw from the ETPL due to reporting burden, consumer choice and geographic access shrink.
- **Funding mix:** A significant portion of Idaho trainees are supported by non-WIOA funding, including Idaho LAUNCH and other state/third-party sources. All-student reporting would compel providers to collect sensitive data (often SSNs) for students outside WIOA—raising burden and privacy concerns and disincentivizing ETPL participation.

- **Observed impact** The Executive Director of the state workforce board reports that providers regularly share feedback that ETP reporting is too cumbersome. Two of Idaho’s four community college presidents conducted a cost benefit analysis and were considering pulling all their programs from the ETPL. This trend threatens consumer choice, cost competitiveness, and training capacity.

Without this waiver, Idaho would be compelled to remove ETPs / programs that cannot or will not submit all-student data, undermining ETPL utility and pushing local areas to rely on ITA exceptions (20 CFR 680.320) more frequently—counter to transparency and choice objectives.

4) Actions already taken to align with USDOL priorities

Idaho has strengthened ETPL transparency and alignment by:

- Publishing WIOA participant performance at the program level in IdahoWorks (completion, employment, median earnings, credential attainment).
- Encouraging providers to submit voluntary program metrics (e.g., licensure pass rates, third-party certifications, work-based learning placements), even when not WIOA-funded.
- Coordinating with Registered Apprenticeship sponsors (20 CFR 680.470) to keep RA options visible on the ETPL.
- Using local demand signals (job postings, sector partnerships, employer advisory input) to inform ETPL approvals and renewals.

These steps preserve consumer choice and WIOA transparency while right-sizing reporting to WIOA-relevant populations.

5) Goals and expected outcomes

Goal: Maintain and expand consumer choice and geographic access to high-quality training while ensuring robust, accurate reporting for WIOA-funded participants.

Expected outcomes if the waiver is approved:

- **Increased ETPL participation and retention:** More providers/programs remain or join the ETPL, particularly in rural and in-demand fields.
- **Improved choice/coverage:** Greater program variety across regions, delivery modes, and price points.
- **Sustained transparency:** Continued publication of WIOA participant outcomes at the program level; optional non-WIOA metrics reported where feasible.

- **Faster onboarding:** Reduced administrative barriers for ETPs lowers cycle time to list/renew programs that meet quality and demand criteria.
-

6) Individuals, groups, or populations impacted

- **Job seekers and WIOA participants:** Broader options, better regional coverage, and more timely starts.
 - **Rural communities:** Reduced risk of provider exit from ETPL **improves local access.**
 - **Employers:** More demand-driven program offerings aligned to local hiring needs.
 - **Training providers:** Lower administrative burden, improved privacy posture, and clearer accountability **for WIOA-funded** outcomes.
-

7) Alignment with WIOA goals and USDOL policy priorities

The waiver maintains accountability where it matters—WIOA-funded participants—while advancing:

- **Customer choice and transparency** (program-level outcomes for WIOA participants remain published).
 - **Employer engagement and sector alignment** (ETPL remains responsive to in-demand occupations).
 - **Access** (reduces ETPL contraction in rural/frontier areas).
-

8) Monitoring and continuous improvement

If granted, Idaho will implement the following controls:

Data & reporting

- Continue to collect and report all required WIOA participant outcomes under 20 CFR 677.230.
- Publish WIOA program-level outcomes in IdahoWorks at least annually.
- Encourage—but not require—submission of aggregate non-WIOA indicators (e.g., licensure pass, completion) where available.

Program oversight

- Include waiver impact checks in annual on-site/desk reviews (ETPL compliance, consumer choice, regional coverage).
- Track ETPL participation (providers/programs) and **time-to-approval**; flag material declines by region/occupation for action.

Corrective action

- If transparency or access measurably declines (e.g., $\geq 10\%$ drop in regional program availability), Idaho will propose improvements (targeted outreach, technical assistance, or policy adjustments).

9) Public notice and comment

Idaho's waiver request is posted on the Idaho Workforce Development Council's website for public comment and review by required parties. The public comment period began on February 9 and will close on March 11, 2026.

No local workforce development boards are adversely affected by this waiver. A copy of the waiver request and the proposed State Plan modification was provided to members of the Idaho Workforce Development Council in accordance with required notification procedures.

10) Assurances

- Idaho will not waive ETPL eligibility criteria, program quality standards, or RA automatic eligibility under 20 CFR 680.470.
 - Idaho will continue to ensure that ITA-funded training is tied to in-demand occupations and that program performance for WIOA participants informs funding decisions.
 - Idaho will maintain all privacy, security, and FERPA-aligned protections for participant data.
-

Waiver D. – To Waive the Requirement for a Comprehensive One-Stop Center in Each Local Area

(1) Identify 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

The state of Idaho, in agreement with the State Workforce Investment Board. (SWIB), is requesting to waive the requirement outlined in WIOA sec. 121 (e)(1) and 20 CFR 678.300 (c) and 678.605 to maintain comprehensive one-stop centers in each local area for Program Years 2026 and 2027. Idaho's two local areas, the Balance of State (BOS) and Eastern Idaho, are overseen by its SWIB, which carries out the roles and responsibilities of the local workforce development boards (LWDB) through a waiver from USDOL issued at the inception of WIOA. This waiver removed barriers, such as minimizing administrative activities costs, reducing administrative burdens, and allowing the state to redirect funding for direct participant services. Idaho has historically sought to eliminate and reduce these barriers to increase prospective participants' access to its WIOA programs across the state.

(2) Describe the actions that the State or local area has undertaken to remove State or local statutory or regulatory barriers

No state or local statutory or regulatory policies limit the state from implementing WIOA programs in each local area without a comprehensive one-stop center.

(3) Describes the goals of the waiver and the expected programmatic outcomes

The primary goal of this waiver is to reduce the administrative burden necessary for the establishment of not just one, but two comprehensive one-stop centers. This reduction would help to eliminate any specific overhead costs associated with this designation, freeing these funds for direct services to individual and business customers. The programmatic outcome is to allow staff the ability to focus on direct or indirect service provision, rather than spend time engrossed in addressing administrative constraints that do not realistically enhance or improve services to WIOA participants with the available funding. To maximize resources available for direct service delivery, the state will continue to use:

- the SWIB as the local workforce board; and
- the current Youth, Adult, and Dislocated Worker service delivery structure

(4) Describe how the waiver will align with the Department's policy priorities

The requirement to establish a comprehensive one-stop center in each local area has significantly impacted the state's progress to advance WIOA programs across Idaho by adding an estimated \$19,607 in administrative costs, which could otherwise be used to serve 6 Idahoans in WIOA programs. All of Idaho's affiliated AJCs provide the same level of service as outlined under 678.305, which defines a comprehensive one-stop center. Each

AJC already provides direct access or closely coordinated indirect service access to all workforce partner programs, as identified in the state's most recent One-Stop certification review.

The preamble of WIOA's Final Rules notes the following:

...many local areas will require the establishment of multiple centers to serve their populations properly. This is highly dependent on individualized factors in each local area. This determination is best carried out at the State and local planning level. WIOA sec. 121(a) requires the establishment of the one-stop delivery system, consistent with the approved Unified or Combined State Plan, through the Local WDB for a local area and with the agreement of CEO for the local area. It is these entities that should determine the proper number and location of one-stop centers, by drawing on their knowledge of the area's needs.

Idaho followed this guidance as it implemented WIOA across the state. The Governor-appointed SWIB, in its role as LWDB, recognized that each local area necessitated more than one AJC to adequately serve its residents, with each site providing the full complement of required services under WIOA.

in 2019, the Idaho Department of Labor transitioned its traditional brick-and-mortar service delivery system in favor of a "multiple hub-and-spoke" delivery model. This model has one or more offices serving as regional hubs and a network of "mobile offices" spread throughout more rural localities, typically sharing space with various local entities, such as libraries or chambers of commerce. These mobile offices provide similar services like assisting job seekers and employers with labor needs and connecting those eligible with other department programs like WIOA Title I-B programs. An evaluation of this plan implementation showed that overall enrollment in the adult program within each region did not see a significant shift between residents still served by a brick-and-mortar IDOL office and those in counties without such a physical presence. This meant that mobile offices sustained the adult WIOA enrollment levels achieved by the brick-and-mortar sites, albeit at a much lower cost.

(5) *Describe the individuals affected by the waiver*

The initial change to a single statewide planning area structure, in conjunction with this waiver, will provide Idaho with a structure that ensures more job seekers are served throughout the state. As evidenced since its initial implementation, the single statewide planning structure has reduced annual overhead and maximized available funding for training and direct customer services. This statewide structure enhances efforts to transform the system into a demand driven system and directly supports the importance of local community partnerships. The combination of 29 AJCs and mobile locations represent the state's comprehensive One-Stop delivery system and offers the full range of workforce development services across Idaho.

Rather than continuing to operate multiple one-stop centers designated as “comprehensive”, which provide the same level of services as the other brick-and-mortar (“affiliate”) and mobile offices, the state’s WIOA program would, at a minimum, use cost savings to serve the same number of participants or more, improving the system’s reach to Idaho residents in need of the services of its services.

(6) Describe the processes used to monitor, offer a local board notice, public comment opportunity, and report in the WIOA Annual Report

Idaho’s waiver request is posted on the Idaho Workforce Development Council’s website for public comment and review by required parties. The public comment period began on February 9 and will close on March 11, 2026.

No local workforce development boards are adversely affected by this waiver. A copy of the waiver request and the proposed State Plan modification was provided to members of the Idaho Workforce Development Council in accordance with required notification procedures.

(7) Provide the most recent data regarding the results and outcomes from the waiver’s implementation (if a waiver renewal)

As a new waiver request, this is not applicable.

TITLE I-B ASSURANCES

The State Plan must include assurances that:	
1.	The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients, and basic skills deficient;
	Yes
2.	The State has implemented a policy to ensure local areas have a process in place for referring eligible veterans with employment barriers to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist;
	Yes
3.	The State has established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;
	Yes
4.	The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);
	Yes
5.	Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;
	Yes
6.	The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions;
	Yes
7.	The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);
	Yes

8.	The State distributes adult and youth funds received under WIOA by formula, and no local area shall “receive an allocation percentage for a fiscal year that is less than 90 percent of the average allocation percentage of the local area for the 2 preceding fiscal years” [(WIOA Section 133(b)(2)(A)(ii)];
	Yes
9.	If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;
	Yes
10.	The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report.
	Yes
11.	The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3);
	Yes