

U.S. Department of Labor

Assistant Secretary for
Employment and Training
Washington, D.C. 20210



May 30, 2024

The Honorable Greg Gianforte
Governor of Montana
P.O. Box 200801
Helena, MT 59620

Dear Governor Gianforte:

Thank you for your waiver request submission to the U.S. Department of Labor regarding certain statutory and regulatory provisions of the Workforce Innovation and Opportunity Act (WIOA) and the accompanying plan to improve the statewide workforce development system (enclosed). The waiver requests were received March 5, 2024, as part of your recent WIOA State Plan submission. This letter provides the Employment and Training Administration's (ETA) official response to your request and memorializes that Montana will meet the outcomes and implement the measures identified in its plan to ensure accountability agreed to by State and ETA. This action is taken under the Secretary of Labor's authority to waive certain requirements of WIOA Title I, Subtitles A, B, and E, and Sections 8–10 of the Wagner-Peyser Act in WIOA Section 189(i).

Requested Waiver: Waiver of the requirements outlined in WIOA Section 107(b), to allow a state workforce development board to carry out the roles and responsibilities of a local board.

ETA Response: ETA approves Montana's request for a waiver to allow the state board to carry out the roles of the local workforce development boards in the State. ETA reviewed Montana's waiver request and plan and has determined that the requirements requested to be waived impede the ability of Montana to implement its plan to improve the workforce development system. Given the support for this waiver request by the local elected officials in the local area and the challenges the State and local areas have in mounting a fully compliant local-led board at this time, ETA agrees that the state board is in a better position to ensure effective service delivery in the local workforce areas in the State. Under this waiver, the Governor may designate the state board to carry out the roles and responsibilities of the local boards in the state. In implementing this waiver, the State must:

- Continue to include local input into its activities. As proposed in the Montana's waiver request, the state board must form a subcommittee to reflect the geographic diversity of the State and its local elected officials; and
- Allocate funding to the local area for which the state board is carrying out local board functions.

Requested Waiver: Waiver of the requirement at WIOA Section 121(e)(1) and 20 CFR 678.300(c) to establish and maintain a comprehensive American Job Center (AJC) in each of the State's local workforce development areas.

ETA Response: ETA approves, for Program Year (PY) 2024 and PY 2025, Montana's request for a waiver of the requirement to establish and maintain a comprehensive AJC in each of the State's local areas. Under this waiver, Montana must ensure that job seekers and employer customers in both local areas enjoy equitable access to the programs, services, and activities of all required one-stop partners.

Requested Waiver: Waiver associated with the requirement at WIOA Section 129(a)(4)(A) and 20 CFR 681.410 that the State and local areas expend 75 percent of local formula youth funds on out-of-school youth (OSY).

ETA Response: ETA approves for PY 2024 and PY 2025, which includes the entire time period for which states are authorized to spend each of those Program Year fund allotments, Montana's request to waive the requirement that local areas expend 75 percent of local youth formula funds on OSY. Montana may lower the local youth funds expenditure requirement to 50 percent for OSY. ETA reviewed the Montana's waiver request and plan and has determined that the requirements requested to be waived impede the ability of State to implement its plan to improve the workforce development system. As a result of this waiver, ETA expects that the number of in-school youth (ISY) served will increase, and performance accountability outcomes for overall WIOA Youth (including both ISY and OSY) will remain steady or increase for the majority of the WIOA Youth performance indicators. Montana is also approved to calculate the lowered 50 percent expenditure rate at the State level instead of individually for each local area.

Requested Waiver: Waiver of 20 CFR 681.550 to allow WIOA individual training accounts (ITAs) for ISY.

ETA Response: ETA approves, for PY 2024 and 2025, Montana's request to waive the requirement limiting ITAs to only OSY ages 16–24. In addition to these OSY, Montana may use ITAs for ISY ages 16–21. ETA reviewed Montana's waiver request and plan and has determined that the requirements requested to be waived impede the ability of the State to implement its plan to improve the workforce development system. Approval of this waiver should not impede the Montana's efforts to prioritize OSY, including outreach to the OSY population.

The State must report its waiver outcomes and implementation of the approved waiver in the WIOA Annual Report. ETA will use this information to assess continued waiver approval and to identify promising practices that may be adopted more widely. ETA is available to provide technical assistance to you in support of your goals. If you have questions, feel free to contact my office at (202) 693-2772.

Sincerely,



José Javier Rodríguez

Enclosure

cc: Sarah Swanson - Montana Department of Labor & Industry Commissioner
Nicholas Lalpui, ETA Regional Administrator – Dallas Region
Monica Moguel – ETA Federal Project Officer

Montana 2024 State Plan Waivers

Request #1: State Board Act as Local Boards

WIOA Section 107(b) to allow a state board to carry out the roles of local boards for a Single Statewide Planning Area structure.

Montana is formally seeking a waiver to permit the state workforce board to carry out the functions of local boards for Program Years 2024 and 2025. This waiver request is for a renewal of a waiver previously applied via 20 CFR 679.310(f) which states that a state board may 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. WIOA Section 107(b) also directs a state board for a single state local area to carry out the functions of the local board. The SWIB has acted as both the state and local board under WIA since January 1, 2006. This structure will be (re)reflected in the Combined State Workforce Plan.

No state or local statutory or regulatory policies limit the Governor's authority to allow the state to continue operating as a single statewide planning area.

The primary goal of this waiver is to limit annual overhead and maximize the amount of funds made available for direct services to individual and business customers. The programmatic outcome is to serve the largest number of participants possible with the funding available. To maximize resources available for direct service delivery, the state will continue to use the SWIB as the local workforce board. When initially implemented, this saved the state WIA program approximately \$1.2 million by removing administrative overhead of maintaining multiple regions 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 17 JSM offices serve as the state's American Job Centers offering the full range of workforce development services.

The SWIB was in place prior to the inception of WIOA and its current membership aligns with WIOA's statutorily prescribed composition. This includes a majority representing private business and others representing workforce and education, core partners, labor, and elected officials. Additionally, Montana's education policy is aligned with state and workforce

development goals. This single statewide planning area structure allows Montana to continue successful policies and operations that maximize cooperation, engagement, and service delivery.

The initial change to a single statewide planning area structure, in conjunction with this waiver, provides a structure that ensures more people are served instead of multiple administrative areas splitting minimal funding. Additionally, it allows the state to continue to serve at least the same number of customers of all types, despite reduced and/or level funding over recent years.

Since its initial implementation, the single statewide planning area structure reduced annual overhead cost, strengthened administrative oversight and accountability, reduced potential for disallowed costs, and enabled more funds to go to participants. Montana continues to emphasize a minimum 50% of all WIOA funds go to direct services. This and other program goals are reviewed quarterly. A 30-day public comment period was provided by including this waiver as part of Montana's WIOA Combined State Plan and posted for public comment and noticed to interested parties such as all SWIB members, the SWIB Interested Persons list, the Montana Association of Counties, the Montana League of Cities and Towns, local elected officials, service providers, organized labor, and other partners of the workforce system. The process and notification of interested persons through email is aligned with State of Montana public meeting laws and MTDLI policy. The impact of this waiver to the state's WIOA performance, as well as any other related outcomes, will be collected and reported in the state's WIOA Annual Report.

Looking forward, MTDLI will pursue more input from local elected officials to obtain feedback about this waiver request and history.

The current board membership does include local elected officials from opposite ends of Montana (Beaverhead County and Valley County). These two counties are nearly 500 miles and eight hours apart with different employment and industry needs. The two local areas defined in Montana include Area 1 and Area 2. Area 1 consists of 10 counties in southwest Montana, while Area 2 includes the remainder of the state. According to the 2020 Census, the population of Area 1 is 160,858. The population of Area 2 is 900,847. Another discrepancy with the two local areas is that Area 1 does not include any of Montana's Native American reservations or nations, while Area 2 includes all 7 reservations and 8 tribal nations. With the state board's ability to carry out the roles of local boards, Montana residents are served more effectively and equitably. Dating back to 2005, Governor Brian Schweitzer consulted with local elected officials from the 10 counties within Area 1 to

enter into an agreement for all 10 counties to be included into one state planning area. Since then, local elected officials from all over Montana have served on the SWIB and continue to serve.

Montana has found success with minimal costs (1 board director) and a unified approach to the state's workforce development under the current waiver.

Waiver Request #2 – One Comprehensive One-Stop Center

The state of Montana, in agreement with the SWIB, is requesting to waive the requirement outlined in WIOA sec. 121 (e)(1) and 20 CFR 678.300 (c) to establish a comprehensive one-stop delivery system in each local area for Program Years 2024 and 2025. Although the State of Montana has two local areas, the Balance of State (BOS) and Concentrated Employment Program (CEP), the SWIB carries out the roles and responsibilities of the local workforce development boards (WDB) through a waiver from USDOL at the inception of WIOA. The SWIB's waiver removed barriers, such as minimizing administrative activities costs, reducing administrative burdens, and allowing the state to redirect funding for direct participant services. Historically, the state of Montana had one comprehensive one-stop delivery system (also referred to as American Job Center (AJC)) and 15 affiliate AJCs. Therefore, the requirement to establish a comprehensive one-stop center in each local area would impact the progress the state has made by adding an estimated \$100,000 in administrative costs, which could otherwise be used to serve 20 Montanans in WIOA programs. The two offices in the CEP, Butte and Helena, that would be considered Comprehensive Centers already provide direct access or closely coordinated indirect service access to all workforce partner programs, as identified in the 2023 Certification of the One-Stop Centers.

No state or local statutory or regulatory policies limit the Governor's authority to allow the state to continue operating as a single statewide planning area.

The primary goal of this waiver is to limit annual overhead and maximize the amount of funds made available for direct services to individual and business customers. The programmatic outcome is to serve the largest number of participants possible with the funding available. To maximize resources available for direct service delivery, the state will continue to use the SWIB as the local workforce board.

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 17 JSM offices serve as the state's American Job Centers offering the full range of workforce development services.

The initial change to a single statewide planning area structure, in conjunction with this waiver, provides Montana a structure that ensures more people are served instead of multiple comprehensive one-stop centers providing the same services and splitting minimal funding. Additionally, it allows the state to continue to serve at least the same number of customers of all types, despite reduced and/or level funding over recent years.

A 30-day public comment period was provided by including this waiver as part of Montana's WIOA Combined State Plan that was posted for public comment and noticed to interested parties such as all SWIB members, the SWIB Interested Persons list, the Montana Association of Counties, the Montana League of Cities and Towns, local elected officials, service providers, organized labor, and other partners of the workforce system. The process and notification of interested persons through email is aligned with State of Montana public meeting laws and MTDLI policy. The impact of this waiver to the state's WIOA performance, as well as any other related outcomes, will be collected and reported in the state's WIOA Annual Report. Looking forward, MTDLI will pursue more input from local elected officials to obtain feedback about this waiver request and history.

Montana has found success with minimal costs (1 comprehensive one-stop center) and a unified approach to the state's workforce development under the current waiver.

Request #3: Flexibility in Funding to Increase In-School Youth Enrollments

The State of Montana seeks a waiver from the WIOA Section 129(a)(4)(A) and 20 CFR Part 681.410, which require not less than 75 percent of funds allotted to states under Section 127(b)(1)(C), reserved under Section 128(a), and available for statewide activities under subsection (b), and not less than 75 percent of funds available to local areas under subsection (c), shall be used to provide youth workforce investment activities for Out-of-School Youth (OSY). The state of Montana is requesting:

- The flexibility to lower the minimum expenditure of 75% for OSY to 50% for Program Years 2024 and 2025.

There are currently no state or local statutory or regulatory barriers to implementing the requested waiver. Current State of Montana laws, regulations, and policies follow federal law, regulations, and guidance.

Montana's Governor has reinvigorated a focus to repairing the disconnect between employers and educators, creating sustainable public-private partnerships to create direct to industry workforce pipelines where workers are needed the most. The Governor's Build Montana initiative recognizes that career and technical education (CTE) personalized to each student provides not only the technical skills for occupational advancement but also a vision for the student(s) of what a successful career in industry can mean for the student. Local school boards of trustees in Montana have broad powers to declare flexible course equivalencies and free student seat time in favor of work-based learning opportunities leading to industry credentialed learning.

The above waiver request will result in increased partnership and collaboration between WIOA core partners, the MUS, and the SWIB.

The State of Montana is committed to alleviating barriers to employment. Under the Build Montana initiative, we are designing a public workforce and talent development system which is programmatically and physically accessible to all Montanans.

Montana is also requesting to continue to operate under the current waiver which allows Montana youth service providers the flexibility to use Individual Training Accounts (ITAs) for WIOA ISY. The waiver impacts WIOA regulation 20 CFR 681.550 which prohibits ISY from utilizing ITAs. Without this waiver, only OSY, ages 16-24, can utilize ITAs. Montana is requesting the flexibility to allow the ITAs for ISY ages 16-21 to continue for PY 2024 and 2025. The coordination of these two waivers will expand Montana's ability to serve more of Montana's ISY.

According to the U.S. Department of Labor FY 2022-2026 Strategic Plan, the above waiver request will help fulfill the mission of USDOL: "To foster, promote, and develop the welfare of the wage earners, job seekers, and retirees, of the United States; improve working conditions; advance opportunities for profitable employment; and assure work-related benefits and rights." The waiver request specifically relates to Goal 1; Build Opportunity and Equity for All.

Montana has under-performed with youth performance indicators, for multiple quarters, due in part to the rural nature of the state and the inability of youth

providers to enroll more ISY in our geographically isolated communities. Through this waiver Montana youth providers will have the flexibility to focus on reaching out to more in-school youth to assist in meeting their needs; ensuring they are working toward the successful completion and graduation from secondary and/or post-secondary education; increasing measurable skills gains and the credential attainment rate, median earnings and ultimately meeting employment retention rates after the 2nd quarter and 4th quarter.

Currently, the State tracks WIOA youth expenditures and performance quarterly through MWorks. Our new workforce client management system, to be launched in fall of 2024 will replace this current system, and will expand our performance analytics capabilities). Should any area or provider be identified as underperforming following a quarterly review, technical assistance will be immediately provided.

Goal: Provide more support to an increased number of in-School Youth
The flexibility of the ISY Waiver would allow WIOA Youth providers to enroll more ISY clients without considering the 25% limitations on funding that is in place now. Enrolling more clients who are attending high school gives the ISY improved chances of planning or reaching their career or educational goals. Often, ISY are choosing to not establish an educational or employment goal due to the lack of financial support available to them.

Funding flexibility will also allow for continued support to clients' post-high school or for those currently attending post-secondary education or skills trainings. This includes costs that may be incurred beyond what PELL or other educational grants/scholarships may provide. Approval of this waiver will allow WIOA youth providers:

- To provide additional services such as Work Experiences, Supportive Services and Skills Training that would better prepare clients for entering the workforce upon completion of secondary school;
- To provide support for clients already enrolled in post-secondary schooling or skills training by helping with training costs, tuition, books etc., and supportive services to aide in completion of their planned training;
- Allow for support in assisting clients with transitioning to post-secondary training and or skills training while still attending high school to get a running start on their educational plan or to assist with employment opportunities upon completion of high school;
- To provide more assistance with job training, skills training and supportive

services that will benefit clients that are in need and have no other resources available.

Montana is experiencing an increased demand for assistance from potential clients who are struggling with finding a job and need assistance with basic needs such as:

rent, gas money, clothing for school/work or educational costs.

Goal: Improved flexibility of state, local and statewide activities funding to best meet the needs of our citizens and businesses.

Expected Outcome: Approval of this waiver will allow the opportunity to provide more in-school youth with innovative strategies to address barriers, student retention, engagement, transition, and successful outcomes.

Provide greater opportunity for more youth to complete high school and continue toward multiple career and educational opportunities, including apprenticeship programs, short-term certificates, associate or bachelor's degrees, and sustainable employment.

WIOA encourages strong partnerships to leverage resources and increase opportunities for youth. In the past year, Montana has appointed a Director of Strategic Engagement for WIOA titles I and III and a Montana Ready Coordinator for title II to better align education and workforce and encourage employer-specific workforce pipelines. Additionally, input and implementation will be in coordination with the state's education system, including MUS. The focus is to connect applicable state and local agency efforts to assist youth, including at-risk youth, in leveraging resources. Aligning successful program models will lead to student persistence, retention, completion, career awareness, and employment opportunities.

If the waiver is approved, anticipated beneficiaries include Montana's low-income, at-risk youth, young adult population, and subcontracted WIOA youth service provider staff, workforce development partners, American Job Centers (AJC), parents, teachers, and school counselors and Montana employers/business/industry.

- A formal monitoring will be conducted by the entity designated by the SWIB.
- WSD's Fiscal and Reporting Analysts will collect, analyze, and provide quarterly data and expenditure reports on the status of WIOA youth expenditures. The program manager will examine the effectiveness of this waiver through quarterly desk reviews and provide technical assistance to case managers as needed.

- Service providers will be monitored to verify eligibility for the Youth program.
- Guidance on the program’s eligibility, the application, and related timeliness for reporting participant information is available in the WIOA Operations Manual.

Waiver Request #4 - Use of Individual Training Accounts for In-School Youth

The State of Montana is requesting a waiver to allow Montana’s WIOA youth service providers to use Individual Training Accounts (ITAs) for in-school youth ages 16-21. The waiver impacts WIOA regulation 20 CFR 681.550 which prohibits youth providers from establishing Individual Training Accounts (ITAs) for WIOA in-school youth. According to current WIOA regulations, ITAs are established on behalf of eligible clients to pay for approved training services. Currently, only out-of-school youth (ages 16 – 24) can utilize ITAs. Allowing ITAs for in-school youth provides them the same opportunities for support as out-of-school youth. This will strengthen the opportunity for Montana students to earn industry-recognized credentials while in school, aligning with MUS One-Two-Free Program. If a student is interested, they can currently take two free courses through the MUS. Upon successful completion, a student can then take additional courses at 50% the cost two-year resident tuition. This will help meet the Governor’s goals of “providing our next generation with high-quality education and empowering our workforce with the skills they need to thrive” for PY24 and PY25.

A lack of coordination with the SWIB, to work collaboratively with core and other agency partners to ensure all state and federal resources are available to Montanans who wish to achieve their educational and career goals, may have been a previous barrier. With a reengaged SWIB, it has been determined through board and committee involvement that a reinvention of youth funds can benefit Montana’s in-school youth by braiding funds to allow students the ability to earn an industry recognized credential, through multiple funding sources at the same time as they graduate from high school. This collaboration will also benefit retention, graduation, and credential rates throughout both rural and urban communities.

The Governor’s vision for the Build Montana initiative is driving sustainable public-private sector partnerships to create direct-to-industry workforce pipelines where workers are needed the most. The Governor’s Build Montana initiative recognizes that career and technical education (CTE) personalized to each student gives them the technical skills for occupational advancement and a vision of what a successful career in industry can provide for the student. Local school boards in Montana have broad authority to

declare flexible course equivalencies and free student seat time in favor of work-based learning opportunities leading to industry-credentialed learning.

In addition to ongoing efforts to engage partners and provide meaningful training and collaboration opportunities the Montana is focusing on collaborative projects to better serve customers across the state, including:

- Coordinating with industry, education, and workforce partners to understand and map credentials across agencies.
- Coordinating with industry, education, and workforce partners to understand and map credentials across agencies.
- Developing a state-wide work-based learning collaborative to better align opportunities across various state and local entities to streamline data, funding, and programmatic resources to benefit various educational opportunities; including but not limited to, on-the-job training, apprenticeships, stackable credentials, and degree programs.

Currently, the State of Montana provides minimal state-funded, post-secondary assistance directly to students. However, MUS has offered two free college dual enrollment (DE) courses to eligible students since 2018. During the 2021-2022 academic year alone, 6,578 high school students in Montana took college credit. After taking two free courses, high school students are charged half-price tuition, which is \$55/credit hour. MUS estimates that students have had a 93% cost savings compared to the 4-year tuition in Montana. Notable highlights of the program include:

- 60% of students who take dual enrollment credits enroll in an MUS institution within 2 years.
- DE students have on average a .6 higher GPA.
- DE students have a 15% higher retention rate.
- DE students have 8.5% higher graduation rates.

According to WIOA title II, Adult Education, high school graduation rate has been trending at roughly 86% percent for over four years. With this waiver, in-school youth (ages 16-21) can take advantage of adding to the number of subsidized courses, toward the goal of industry recognized certifications. MUS currently has 145 certifications. With these combined programs, a student could earn a full credential or complete many of the courses necessary, through the combined funding streams of One-Two-Free and WIOA Youth.

This waiver request is consistent with the Governor's priority to provide our next generation with a high-quality education and to empower our workforce with the skills they need to thrive. Specific to this broad goal, the Governor is working to align workforce and education programs with goals of student matriculation into careers, college, or credential programs, improving access to education opportunities for Montana students. The Governor also prioritizes trades education to ensure Montana employers have a highly skilled workforce. The above waiver request will result in increased partnership and collaboration among WIOA core partners, the MUS, and the SWIB.

Alongside this waiver request, Montana is requesting a waiver from Section 129(a)(4)(A) and 20 CFR 681.410 which require not less than 75 percent of funds allotted to states under Section 127(b)(1)(c), reserved under Section 128(a), and available for statewide activities under subsection (b), and not less than 75 percent of funds available to local areas under subsection (c), shall be used to provide youth workforce investment activities for OSY.

Montana is requesting the following waivers to this statutory and regulatory provision:

1. A waiver of the requirement to expend 75 percent of funding on the OSY population. Montana is requesting that this percentage be lowered to 50 percent.
2. A waiver of the requirement that local funding meets the 75 percent minimum expenditure requirement. Montana requests that this percentage be lowered to 50 percent to align with the statewide target (see #1 above).
3. A waiver of the requirement to expend 75 percent of Statewide Activities funding on the OSY population. It is requested to reduce this percentage to 50 percent to allow flexibility of funding special projects that meet the vision and mission of the state.

The coordination of these two waivers will allow for flexibility to serve Montana students, especially in rural areas.

According to the U.S. Department of Labor FY2022-2026 Strategic Plan, the above waiver request will help fulfill the mission of USDOL: "To foster, promote, and develop the welfare of the wage earners, job seekers, and retirees, of the United States; improve working conditions; advance opportunities for profitable employment; and assure work-related benefits and rights." The waiver request is specifically related to Goal 1; Build Opportunity and Equity for All. This goal focuses on ETA 1.1: "Create customer-focused workforce solutions that serve all workers, including underserved communities." The combination of both waivers requested will help to provide

credentialing opportunities to secondary students entering the workforce, especially in more rural communities in Montana. As previously stated, Montana has performed below negotiated youth performance metrics for multiple quarters. The above requested waivers address Montana's identified barriers of reaching more in-school youth, to assist with ensuring timely and successful graduation, retention with employment after 2nd quarter and 4th quarter, the credential attainment rate, and measurable skill gain. Service providers would have the flexibility to expend more funding toward qualifying in-school youth, if applicable, but successful providers may continue to serve clients in-school or out-of-school.

Statewide implementation will begin when the waiver is approved. The State of Montana anticipates having a steady increase of enrollments over the next program years with the approval of this waiver. Through this waiver, in-school youth have the potential to obtain dual credit for both secondary and post-secondary course completion that will help improve Montana's performance by obtaining credentials, measurable skills gains, and ultimately employment and wage gains.

Top solutions from the 2020 Montana Chamber of Commerce Workforce Development survey are as follows:

1. 80% agreed that school districts should be incentivized to put equal emphasis on all career pathways.
2. 80% agreed that school districts should be required to incorporate workforce readiness skills in their curriculum.
3. 77% agreed that career advising in middle and high school needs to be strengthened.
4. 73% agreed that business and economics education should be required in middle and high school.

Other top solutions include:

5. Increased support for education and skill-attainment programs for adults;
6. Require science, technology, engineering, and math (STEM) education in 6-12 grades;
7. Create more registered apprenticeship programs;
8. Increase support for government-funded workforce training centers;
9. Promote policies to lower housing costs;
10. Provide financial aid incentives for students in high-demand fields; and
11. Increase support for government-funded childcare;

Items 1, 2, 3, 5, and 10 are partially addressed with this waiver request, allowing more funding opportunities to students and their career aspirations.

Goal: Increase services to youth in our local schools and communities, despite their educational status to earn industry recognized credentials alongside high school diplomas.

Expected Outcome: Approval of this waiver request will allow the state to balance the focus of funds and services on engaging in-school youth to persist in their educational goals through additional dual enrollment opportunities. Ultimately, the goal is for in-school youth to earn an industry recognized credential alongside their high school diploma. It is much more cost-effective to keep youth enrolled in school and engaged in a career pathway, and in the long run, will support attainment of quality jobs in in-demand careers.

Goal: Supporting students in school through successful graduation and transition into post-secondary education and employment.

Expected Outcome: Approval of this waiver will provide greater opportunity for youth to complete high school and continue on a pathway toward multiple career and educational opportunities, including but not limited to apprenticeship programs, short-term certificates, associate or bachelor's degrees, and sustainable employment.

Goal: Improved flexibility of state, local and statewide activities funding to best meet the needs of our citizens and businesses.

Expected Outcome: Approval of this waiver will allow Montana to implement innovative strategies to address barriers facing at-risk youth on an individualized basis and encourage innovative strategies to address student retention, engagement, transition, and successful outcomes. This waiver will also improve students' ability to align career goals with stackable credentials to meet industry-driven demands for workers.

WIOA encourages strong partnerships to leverage resources and increase opportunities for youth. In the past year, Montana's newly appointed Director of Strategic Engagement for WIOA title I and III and the Montana Ready Coordinator for WIOA title II will better align education and workforce to encourage employer-specific workforce pipelines. Additionally, input and implementation will be in coordination with the state's education system, including MUS. The focus is to connect applicable state and local agency efforts to assist youth, including at-risk youth, in leveraging resources and aligning successful program models that lead to student persistence, retention, completion, career awareness, and employment opportunities.

Montana's low-income, at-risk youth, and adult population, JSM, and subcontracted service provider staff, Montana employers/business/industry,

parents, teachers, and school counselors will benefit from the waiver, if approved.

- A formal monitoring will be conducted by the entity designated by the SWIB.
- The WIOA Title I youth program manager(s) will provide technical assistance to case managers.
- Service providers are required to verify eligibility for the Youth program.

Guidance on the program's eligibility, the application, and related timeliness for reporting participant information is available in the WIOA Operations Manual.