

U.S. Department of Labor

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



May 28, 2024

The Honorable Eric Holcomb
Governor of Indiana
State House Room 206
Indianapolis, IN 46204-2797

Dear Governor Holcomb:

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 4, 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 Indiana 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: The State is requesting a waiver of the state workforce development board membership requirements at WIOA Section 101(b)(1) and (c) and the corresponding regulations at 20 CFR 679.110(b)-(c).

ETA Response: The State is requesting a waiver to substitute the WIOA state board membership requirements with alternate requirements. The State affirms that this waiver will streamline board size, increase coordination between employers and state government, and improve board accountability. ETA reviewed Indiana's waiver request and plan and has determined that the requirements requested to be waived impede the ability of Indiana to implement its plan to improve the workforce development system. Therefore, ETA approves this waiver through June 30, 2026.

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 Governor's reserve youth funds and local formula youth funds on out-of-school youth (OSY).

ETA Response: ETA approves for Program Year (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, the State's request to waive the requirement that the State expend 75 percent of Governor's reserve youth funds on OSY. ETA reviewed Indiana'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. The State may lower the expenditure requirement of Governor's reserve funds to 50 percent for OSY and may lower the OSY expenditure requirement for Governor's reserve funds to 50 percent.

In addition, 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, the State's request to waive the requirement that local areas expend 75 percent of local youth formula funds on OSY. The State may lower the local youth funds expenditure requirement to 50 percent for OSY. 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.

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,

A handwritten signature in blue ink that reads "José Javier Rodríguez". The signature is written in a cursive, flowing style.

José Javier Rodríguez

Enclosure

cc: Richard Paulk, Commissioner, Indiana Department of Workforce Development
Pam Gerassimides, ETA Regional Administrator – Chicago Region
Julie Baker, ETA Federal Project Officer

Indiana 2024 State Plan Waiver Requests

GWC Waiver

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.

For PY 24-25, The State of Indiana is requesting a waiver from Section 101(b)(1) and (c) and the corresponding regulations at 20 CFR 679.110(b)-(c), which requires how the State Workforce Development Board (SWDB) is to be structured.

The State of Indiana requests that the waiver for the membership of the Indiana Governor's Workforce Cabinet (i.e., SWDB), be granted for a two-year period. This waiver will grant Indiana the flexibility to continue to the alignment of our State and Federal workforce systems. Since 2018, Indiana has been granted this waiver which has allowed the State to achieve greater connectivity among workforce partners, thus creating coordinated strategies among required WIOA partners and non-required partners.

The State of Indiana recognizes that the membership of the SWDB must meet the requirements of WIOA sec 101(b) and must represent diverse geographic areas of the State, however the structure of the Governor's Workforce Cabinet has positioned Indiana competitively to attract good jobs and serve as a workforce leader in the Midwest. It is through the current structure of the SWDB that Indiana was able to successfully be awarded the designation of a tech hub and hydrogen hub, in alignment with federal workforce investments relative to the CHIPS and Science Act, Bipartisan Infrastructure Law, and more. Members of the SWDB are strongly positioned to strategize, leverage resources, and deliver coordinated workforce solutions to Hoosier individuals and employers across the State. The 2024-2027 Unified State WIOA Plan includes goals and strategies that will make good on our promise to spearhead workforce investments and initiatives in the Midwest and nationally.

At the local level, this waiver for the Cabinet structure allows us to set a common vision, strategy, and implementation plan with local workforce development boards, empowering them to act upon these elements in their local workforce development area.

2. Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers.

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

The Indiana General Assembly passed, and Governor Holcomb signed Senate Enrolled Act 50 in 2018, Indiana Code 4-3-27. The bill created the Governor's Workforce Cabinet to comply with the federal requirements for a SWDB under the Workforce Opportunity and Innovation Act (WIOA):

Sec. 4. (a) The cabinet shall serve as the state advisory body required under the following federal laws:

(1) The Workforce Innovation and Opportunity Act of 2014 under 29 U.S.C. 3101 et seq., including reauthorizations of WIOA.

(2) The Wagner-Peyser Act under 29 U.S.C. 49 et seq.

(3) The Adult Education and Family Literacy Act under 20 U.S.C. 9201 et seq.

(b) In addition, the cabinet may be designated to serve as the state advisory body required under any of the following federal laws upon approval of the particular state agency directed to administer the particular federal law:

(1) The National and Community Service Act of 1990 under 42 U.S.C. 12501 et seq.

(2) Part A of Title IV of the Social Security Act under 42 U.S.C. 601 et seq.

(3) The employment and training programs established under the Food Stamp Act of 1977 under 7 U.S.C. 2011 et seq.

The membership of the GWC consists of 34 total members, of which 29 members have voting privileges. Members represent different geographic areas of the state, and include business and community leaders, K-12 and Career and Technical Education representatives, appointees from postsecondary institutions, Indiana lawmakers and experts from state agencies. This unique structure allows for a comprehensive view of workforce from early childhood, K-12, post-secondary, and adult education to the world of work.

GOVERNOR'S WORKFORCE CABINET MEMBER ROSTER & ROLES

1. A chairperson appointed by the Governor. (*Ryan Kitchell*)
2. The secretary of career connections and talent, serving as a nonvoting member. (*Vacant; this agency/role no longer exists.*)
3. The commissioner of the department of workforce development. (*Richard Paulk, Commissioner, Indiana Department of Workforce Development*)
4. The secretary of commerce or the secretary of commerce's designee, serving as a nonvoting member (*David Rosenburg, Secretary, Indiana Economic Development Corporation*)
5. The commissioner of the Indiana commission for higher education. (*Chris Lowery, Commissioner, Indiana Commission for Higher Education*)
6. The secretary of education (*Dr. Katie Jenner, Indiana Secretary of Education*)
7. The president of Ivy Tech Community College (*Dr. Sue Ellspermann, President, Ivy Tech Community College*)
8. The president of Vincennes University (*Dr. Chuck Johnson, President, Vincennes University*)
9. One (1) member representing a research university appointed by the governor (*Todd Richardson, Chief HR Officer and VP Human Resources, Indiana University*)
10. One (1) member representing a comprehensive university or an independent college, appointed by the governor. (*Rob Coons, President, Rose-Hulman Institute of Technology*)
11. A member appointed by the governor who is an apprenticeship coordinator of a joint labor-management apprenticeship program approved by the United States Department of Labor,

Employment and Training Administration, Office of Apprenticeship. (*Mark Kara, Assistant to the Coordinator for Local 150 Operating Engineers*)

12. A member representing high school career and technical education educators or directors appointed by the governor in consultation with the Indiana Association of Career and Technical Education Districts. (*Dr. Steve Rogers, Director, Walker Career Center*)
13. Either:
 1. A member representing manufacturing appointed by the governor in consultation with the Indiana Manufacturers Association; or (*Dan Peterson, Vice President of Industry and Government Affairs, Cook Group Incorporated*)
 2. An employee of the Indiana Manufacturers Association appointed by the governor
14. A member representing a minority business enterprise appointed by the governor. (*Amish Shah, CEO, Kem Krest*)
15. A member representing a women's business enterprise appointed by the governor. (*Jaqueline Barton, President and Founder, Specialized Staffing Solutions*)
16. A member representing a veteran owned business appointed by the governor. (*Tony Vespa, Founder, Vespa Group*)
17. A member representing the nonunion and construction trades appointed by the governor in consultation with the Associated Builders and Contractors, Inc., and the Indiana Builders Association. (*Steve Schreckengast, President and Co-Founder, Citation Homes, Inc.*)
18. Either:
 1. A business owner appointed by the governor in consultation with the Indiana Chamber of Commerce. (*Micah Vincent, Chief Operating Officer of Heritage Growth, The Heritage Group*)
 2. An employee of the Indiana Chamber of Commerce appointed by the governor
19. A small business owner appointed by the governor in consultation with the National Federation of Independent Businesses. (*Loren King, President/CEO, Trinitas*)
20. A member of a community-based organization appointed by the governor. (*Fred Payne, President and CEO, United Way of Central Indiana*)
21. Three (3) at-large business owners appointed by the governor, one (1) of whom is a business owner who employs less than fifty (50) employees. One (1) member appointed under this subsection shall be from an organization representing technology.

- *(Rebecca Schroeder, President of Whiteshire Hamroc)*
 - *(Megan Glover, CEO of 120WaterAudit)*
 - *(Chris LaMothe, Ascendanci Ventures)*
22. A school principal, appointed by the governor *(Jody French, Principal, Perry Central Jr./Sr. High School)*
 23. A school superintendent, appointed by the governor *(Paul Ketcham, Superintendent, Batesville Community School Corporation)*
 24. The commissioner of the department of correction, serving as a nonvoting member. *(Christina Reagle, Commissioner, Indiana Department of Corrections)*
 25. The secretary of family and social services, serving as a nonvoting member. *(Dr. Dan Rusyniak, Secretary, Indiana Family and Social Services Administration)*
 26. A member of the house of representatives appointed by the speaker of the house of representatives who serves as a nonvoting member. *(Representative Bob Behning, House Education Chair)*
 27. A member of the senate appointed by the president pro tempore of the senate who serves as a nonvoting member. *(Senator Jeff Raatz, Senate Education and Career Development Chair)*
 28. Any additional members designated and appointed by the governor.
- *(Joyce Irwin, President, Community Health Network Foundation)*
 - *(Becca McCuaig, Legal Counsel for Accelerate Indiana Municipalities, a statewide non-partisan advocacy organization for Indiana municipalities)*
 - *(Dave Shane, Lilly Endowment Inc. Board Member, former CEO of Lacy Diversified Industries)*
 - *(David Adams, Principal, Adams Advisors LLC)*
 - *(For Adult Education – Marilyn Pitzulo, Associate Chief of Workforce Strategy and Design – Indiana Department of Workforce Development)*
 - *(For Vocational Rehabilitation – Theresa Koleszar, Director of the Bureau of Rehabilitation Services, Indiana Family and Social Services Administration)*

3. Describes the goals of the waiver and the expected programmatic outcomes if the request is granted.

The goal of the waiver is to allow flexibility in the membership requirements of the SWDB under WIOA Sec. 101(b)(1) and (c). WIOA highlights the importance of states working to address the skills gap and align resources. The U.S. Department of Labor has specifically said reducing barriers to allow state innovation and efficiency is always important to the Department's mission of a skilled workforce. The size and membership requirements create barriers to that efficiency.

Under the Cabinet's current SWDB structure, membership includes lead state officials with responsibility for WIOA Title I and Wagner Peyser Act, Adult Education and Family Literacy Act, Vocational Rehabilitation, and other core program partners, elected officials, and representatives from the state's economic development agency and institutions of higher education.

In addition, the SWDB membership also includes representatives from the K-12 education system, Indiana philanthropic organizations, minority businesses, industry associations, and more. A direct correlation can be made to how the SWDB is structured and comprised and Indiana's success in aligning state workforce systems to federal workforce initiatives and programs like the CHIPS and Science Act, Bipartisan Infrastructure Law, and more.

Should the waiver be granted, the SWDB will be able to expand upon recent designations, such as the Silicon Crossroads Microelectronics Commons Hub, Heartland BioWorks Tech Hub, and the Midwest Hydrogen Hub, to ensure education, workforce, and economic development partners are aligned and equipped with the tools to successfully implement the envisioned outcomes of these programs.

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

E. Other guidance issued by the Department

The composition of the Cabinet provides an opportunity to hear from and provide solutions to employers in Indiana's key sectors. Regularly scheduled Cabinet meetings, which occur in-person across the State, provide the opportunity for local employers and elected officials to participate, in addition to sharing their workforce challenges, concerns, and ideas to members of the Cabinet. Unique representation of K-12 leaders from the State's public education system help align State workforce and education goals (e.g., graduation rates, increased work-based learning enrollment, postsecondary education and training, etc.) to current and future employer needs.

The composition of the Cabinet also provides stronger coordination for increased work-based learning opportunities. As detailed in this plan, the Indiana Legislature allocated funding to support students enrolled in work-based learning programs, including funds to overcome barriers to entry. Legislative action was a culmination of recommendations shaped by GWC board members, including industry, education, workforce, and philanthropic partners.

Future outcomes will continue to develop through implementation of the strategies outlined in the State Plan.

5. Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment.

Individuals who will most benefit from this waiver include (1) Hoosier jobseekers who are sidelined from entering the workforce due to barriers (e.g., transportation, childcare, etc.), (2) employers seeking skilled talent for existing industries and employers seeking talent for emerging sectors (e.g., semiconductor manufacturing, electric vehicle battery manufacturing, biolife sciences, clean energy, etc.), and (3) WIOA

targeted populations (e.g., individuals with disabilities, youth, veterans, military spouses, farmworkers, and Native Americans among others).

The GWC membership composition includes representatives that most directly serve these populations. By having their voice at the table, the Cabinet is able to identify and apply resources to support individuals-served, monitor success (or challenges) of state workforce strategies and adapt as necessary, and elevate best practices that can be scaled statewide to support state and federal workforce initiatives.

Additionally, local workforce development boards will continue to benefit from increased connectivity of State government (e.g., workforce development, education, economic development, Governor's Office, etc.).

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

One of the functions of the Cabinet is to review, monitor, and recommend changes to the state's workforce system. As such, there will continually be an eye toward how Hoosiers are impacted by the policy decisions of the Cabinet and the programs implemented at both a State and local level. Outcomes that result from aligning these systems will be included in the State's annual WIOA report.

Public Comment. This waiver request was available for public comment concurrently with Indiana's Draft Unified State Plan prior to submission to USDOL/ETA for consideration. The waiver request was shared with

several stakeholders, including each of Indiana's twelve local workforce development areas. The waiver request was highlighted on the Governor's Workforce Cabinet (GWC) and DWD websites. A copy of this waiver request is also maintained at DWD's central office for inspection upon request.

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.

The Cabinet prides itself on the direct results and outcomes observed through the implementation of the existing waiver. Results and outcomes are produced in terms of workforce system improvements and achievements.

During the waiver modification review in 2022, quantifiable goals were established. (The following items will be updated with 2023 data during Q2-Q3 2024.)

1. Increase Indiana's educational attainment rate with a specific goal of having 60% of Hoosiers with a quality credential beyond high school by 2025. Consistent with its Perkins submission, Indiana will target an 8% increase in credential attainment over the waiver period.

Indiana set a goal to develop pathways towards higher education attainment rates post-high school for 60% of Hoosiers aged 25-64 by 2025. Since 2019, progress towards that goal has increased from 48.3% to 54%. Dating back to 2009, Indiana has increased by 21 percentage points.^[1] The majority of the 2019-2021 increase is attributed to certificates and certifications—a 3.4% increase. In program year 2021, over 10,000 noncredit bearing and credit bearing credentials were awarded through the Workforce Ready Grant (WRG). In total, over 38,000 completions have been awarded since the programs' inception. In 2023, biennial funding for WRG was tripled to \$24 while funding for ETG was sustained, totaling a combined \$58M. In

addition to short term credential attainment and targeted focus through the WRG, credential attainment within K-12, CTE and Postsecondary Education received administrative and legislative support to further develop K-12 graduation pathways, bolster adult education training, and incentivize post-secondary graduate in-state retention during the 2023 legislative session. Perkins credential attainment metrics remained flat with 20% of concentrators receiving a credential through career technical education.

2. Expand work-based learning opportunities for both youth and adult populations. Indiana will target a 6% increase in work-based learning participation over the waiver period.

During the waiver period, Indiana saw a decrease in the number of active apprenticeships, declining from 18,504 active apprenticeships at year end 2021 to 17,185 in 2022; however, new apprenticeships rose from 7,137 to 7,402 over the same period. Registered apprenticeship programs also declined from 1,173 to 900 and new program counts dropped from 66 to 58. Despite a slight year over year decrease, Indiana maintains the highest labor force to apprenticeship ratio nationally at .51%. Outside of federally recognized apprenticeships, Indiana saw increased participation in Perkins Work Based Learning Participation rising from 13% of concentrators in year ending 2021 to 18% of concentrators in year ending 2022. To improve K-12 employment and post-secondary pathway development, HEA 1002 established additional infrastructure to support work-based learning through Career Scholarship Accounts which will provide up to \$5,000 per student in allowable expense reimbursement to the employer to help remove student barriers for entering the workplace. In addition, HEA 1002 will increase connections to student to employer building career coaching intermediary capacity within high schools. The Employer Training Grant, an on-the-job training grant program which was distributed through regional workforce development boards, during PY21 and PY22 served nearly 900 employers with 5,700 individuals receiving on the job training support. Within Adult Education 5,000 individuals received assistance through the Workforce Education Initiative (WEI). WEI enrollment increased by 47% year over year.

3. Increase employer engagement with a focus on engagement with minority-, women- and veteran-owned businesses. Indiana will target a 10% increase in employer engagement over the waiver period.

From 2021 to 2022, Indiana increased employer engagement with a 9% increase in total businesses served. Over this timeframe, work-based learning assistance increased by 50%, engagement in strategic planning and economic development increased by 40%, and assistance to access untapped labor pools also increased by 40%. Women, minority, and veteran-owned business engagement increased by 6% in number of businesses served.

IN ADDITION TO QUANTIFIABLE GOALS:

In addition to the quantifiable metrics, the composition of the Cabinet has played a critical role in setting workforce strategy and direction for Indiana which is aligning with the ETA Vision 2030. In 2022, Cabinet members worked to set focus and develop solutions through a set of Recommendations that were developed for the Governor and members of the Indiana General Assembly, ahead of the 2023 legislative session. Some of the GWC Recommendations required policy and legislative action while other solutions could be realized through administrative changes and budget allocation. These Recommendations were solutions-focused, actionable and timely and most of all, realistic based on the input and experience from the variety of Cabinet members at the table – all with a vested interest as a contributing member of the Cabinet/SWDB. The Recommendations were well received, and now form the basis for Indiana’s 2024-2027 Unified State WIOA Plan. This framework, developed by Cabinet members, will also serve as the framework for the local workforce plans.

The three pillars with some examples are listed below. There is now even greater alignment with this structure and Indiana's 2024-2027 Unified WIOA state plan submission, due in part to the contributions, experience, foresight and variety of Cabinet/SWDB members.

1. Helping Employers Find Skilled Workers

- Accelerate Digital Development in Indiana
- Develop a Career Navigation Network
- Prepare Workers with Digital Skills Training
- Incentivize College Graduation Rates for Key Degrees
- Bolster STEM Development via IU/Purdue Realignment
- Define Work-Based Learning and Build a Work-Based Learning Student-Employer Connector Model
- Scale Indiana's Next Level Programs of Study

2. Removing Barriers for Workers

- Provide Monetary Support to Remove Student Barriers
- Expand Transportation Options for Working Youth
- Increase Access to Early Learning Services
- Increase Adult Education Funding and Launch
- Increase Employers Offering On-Site Education and Training
- Simplify and Automate the Expungement Process
- Auto-Enroll Financially Eligible Students in 21st Century Scholars
- Require High School Students to File the FAFSA
- Restore Frank O'Bannon Grant (state-level grant) Funding to Pre-Recession Levels

3. Prepare Future Skilled Workers

- Rethink High School by Increasing Diploma Flexibility
- Increase Access to Credentials of Value
- Incentivize Completion of Credentials of Value in High School
- Increase Access to High-Quality STEM Curriculum and Opportunities
- Strengthen the Educator Pipeline in STEM-Related Subjects
- Focus Early Childhood Education Programs on Educational Results
- Increase Kindergarten Readiness by Establishing a Dolly Parton Library of Indiana
- Ensure Students Can Read by the End of Third Grade
- Award “Second Year” of College to High School Dual Credit/Certificate Completers
- Ensure a Stackable Credential Attainment System

We will be revisiting our quantifiable metrics and adding additional tracking measures as we continue to more closely align Indiana’s workforce and education efforts.

[1] <https://www.luminafoundation.org/stronger-nation/report/#/progress/state/IN>

Youth Waiver

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.

For PY 24-25, The State of Indiana 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.

Indiana is requesting an extension of the following waiver to this statutory and regulatory provision:

- A waiver of the requirement to expend 75 percent of funding on the OSY population. Indiana is requesting that this percentage be lowered to 50 percent.
- A waiver of the requirement that local funding meets the 75 percent minimum expenditure requirement. Indiana requests that this percentage be lowered to 50 percent to align with the statewide target (see 1 above).
- 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.

Because JAG Indiana serves students with significant barriers to graduation, approval of this waiver will allow Indiana to continue to invest in at-risk youth before they drop out of high school. When entering the program, approximately 40% of JAG Indiana students have low academic performance or are basic skills deficient.

JAG Indiana serves more than 4,000 in-school youth who are at-risk for dropping out of high school in 125 school-based programs. JAG Indiana has proven outcomes with students graduating at a rate of over 95% for the Class of 2022, which remains higher than the average State graduation rate of 86.6% for all students and 83% of those who receive Free/Reduced price meals. JAG Indiana and WIOA performance goals are aligned to achieve positive outcomes with a focus on attainment of a credential and placement in higher education or training, employment, or military service.

School administrators and counselors refer students to the JAG Indiana programs because of the successful model and associated outcomes. This vulnerable population receives daily counseling and support by "Specialists" while delivering competency-based curriculum. Central to the JAG model is a focus on serving the most disadvantaged youth in communities most in need across Indiana. There is an inherent focus on

diversity, equity, and inclusion in our programming both in JAG and WIOA youth services, as enrollments across in-school and out-of-school youth lean into minority populations across multiple intersectionality, including, but not limited to gender, race, sexual orientation, and disability status. Access to high quality programming, like JAG, for these students is of the utmost importance to their sense of belonging and identity which fuels their success in school, as showcased in overall programmatic outcomes shown below:

Programmatic Outcomes	2022	National Goal
Graduation Rate	95%	90%
Entered Employment	73%	60%
Full-time Employment	83%	60%
Full-time Positive Outcomes	83%	75%
Post-Secondary Outcomes	40%	35%

Specific goals of the PY24-25 waiver request are to increase flexibility of WIOA statewide activities and formula funding to support:

- The implementation of evidence-based programs and strategies;
- Progress toward closing the economic inequity gap;
- Placing more Hoosier youth on the path to high-wage skills; and
- Increase college readiness.

All four of the above strategies can be met by continuing to serve and/or increase the number of high school youth served through the JAG Indiana dropout prevention program. This allows us to be proactive about addressing the out-of-school youth problem, while simultaneously increasing the number of youth who enter the workforce and/or post secondary education with the skills to succeed in either goal.

2. Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers.

Since the inception of WIOA, Indiana has requested and been approved for waivers from U.S. Department of Labor to support flexibility in serving in-school youth through the JAG program.

3. Describes the goals of the waiver and the expected programmatic outcomes if the request is granted.

As previously noted, Indiana's high school graduation rate has stagnated at less than 90% for years. While Indiana school counselors are over-burdened with increasing caseloads of students, averaging 532:1 (more than twice the recommended caseload), and growing administrative responsibilities, the State of Indiana is requesting increased flexibility of WIOA statewide activities funding to implement a statewide program focused on providing a comprehensive set of services designed to keep In-School Youth (ISY) attached to the education system to improve their rate of success in achieving educational and career goals. The DWD has identified the Jobs for America's Graduates program to be this solution in schools where it is most needed, given its previously described history of success and linkages to employers and community resources that will best benefit the students it serves.

Following the JAG National performance outcome requirements, DWD and the JAG Indiana program, pledge to strive to meet the following requirements:

JAG National Follow-up Goals	Multi-Year	Alternative Education
Graduation or HSE	90%	75%
Employment	60%	50%
FT Employment (30 hrs./week)	60%	50%
Total Full-Time Positive Outcomes (Employment, Education, Military)	75%	60%
Further Education Rate	35%	30%
Connectivity Rate	93%	93%

As previously shown, DWD has met or exceeded these metrics for over 7 years in a row, with one exception to the Further Education Rate for the Class of 2020, which aligned with national trends due to the COVID-19 pandemic.

As evidenced by the chart below (showcasing PY22 data), Indiana’s waiver has allowed the state to enroll larger populations of in-school youth, whose participation in dropout prevention programming has led to positive outcomes contributing to the overall strong WIOA youth performance metrics:

ISY	NUM	DEN	%
Q2ER	757	925	81.8%
Q4ER	711	826	86.1%
MED			\$4053.84
CRED	660	826	79.9%
MSG	1203	1437	83.7%

As compared to out-of-school metrics, which although demonstrating strong performance, programming for in-school youth clearly buoy Indiana’s overall youth outcomes:

OSY	NUM	DEN	%
Q2ER	886	1115	79.5%
Q4ER	874	1074	81.4%
MED			\$5200.00
CRED	404	653	61.9%
MSG	620	1042	59.5%

Additionally, as noted in the numerator/denominator values, there are overall more out-of-school youth participants exiting to successful employment opportunities. PY23 data to-date shows Indiana is currently tracking to exceed prior year performance in median earnings and credential attainment, but are focused on overall WIOA youth negotiated rates as follows:

- Employment Q2: 78.4%
- Employment Q4: 78.6%
- Median Earnings: \$3341.00
- Credential Rate: 65%
- Measurable Skills Gain: 65%

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

E. Other guidance issued by the Department

This waiver request aligns with the above U.S. Department of Labor policy priorities in numerous ways as noted below:

- Use of the waiver and its focus on JAG in Indiana allows our strong network of over 500 unique employers to connect with in-school youth for employer tours, pathway planning, work experience and internships and myriad other ways that support a strong connection between employer and student;
- Existing strong partnerships with our statewide community college system through Ivy Tech Community College and other education and training partners will continue to grow with use of the approved waiver, encouraging more students to meet the State’s goal of 60% attainment of high-quality credentials by 2030;

- Indiana's in-school youth programs focus on supporting work-based learning, skills development, and work readiness while promoting training strategies that lead to credential attainment and closing the skills gap with goals of over 75% credential attainment; and
- Connection between WIOA in-school youth programming and local high schools ensure students meet the rigorous demands of the Indiana Department of Education Graduation Pathways requirements focused on diploma attainment, demonstration of in-demand employability skills and post-secondary readiness.

5. Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment.

Currently, JAG Indiana utilizes a limited amount of WIOA funds to operate its in-school model. With WIOA funds continuing to decline and if Indiana is limited to 25% of WIOA youth funding to serve only in-school youth, DWD would be forced to close over 25 JAG Indiana programs across the State, potentially removing nearly 1,000 students from the dropout prevention program and negatively impacting local communities statewide.

This waiver will ultimately impact Indiana's at-risk young adult population. WorkOne Centers (Indiana's term for American Job Center) and subcontracted service provider staff, workforce development partners, employers, parents, and school counselors will also benefit from the waiver.

Students enrolled in the JAG program face numerous barriers to success (average of 8 barriers/student). Below is snapshot of the ten (10) most common barriers among our at-risk population:

- Low academic performance (an average grade of C or GPA of 2.0 or below)
- A past record of excessive absences as verified by school officials (10 or more absences)
- Low self-esteem
- Not connected to any extracurricular activities, community orgs, or teams/clubs
- Economically disadvantaged as defined by public assistance, TANF, or free lunch

- Has a fear of speaking in public, is shy, or would like to develop healthy social skills
- Needs transportation to and from work or school
- Lacks motivation or maturity to pursue education or career goals
- Having inadequate or no work experience
- Lacks marketable occupational skills that are in demand in the local labor market

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

Monitoring Progress and collecting/reporting information. WIOA programmatic reviews will include an evaluation of how local waivers are being utilized to ensure programmatic goals and outcomes are being met. The regional Youth Directors and State staff dedicated to the administration of the WIOA Youth program will continually examine the effectiveness of waivers throughout the PY, including monthly fiscal reviews and bi-annual desk reviews. This strategy ensures that the objectives described above, as well as those outlined in the existing State and local WIOA plans, are consistent with established objectives of the WIOA, and federal and State regulations.

Since 2006, the State has utilized an electronic case management system for all federal and State eligibility-based workforce investment programs. This system, Indiana Career Connect, is configured to support the full integration of programs, eligibility determination, service recording and tracking, and performance

tracking for WIOA, TAA, Wagner-Peyser, Veterans Employment and Training Programs, and Reemployment Programs, as well as for local programs throughout the State, regardless of funding source. Indiana Career Connect has been designed to record service delivery information on every client service while providing transaction records necessary to document program performance. This crossmatch of data allows DWD and Workforce Development Boards to effectively determine such outcomes as credential attainment, employment status and participant earnings in a more rapid timeframe than other mechanisms. DWD will monitor the progress of the waiver implementation through analysis of local performance results as well as through ongoing oversight and exchanges with local area management and staff.

Local Boards and Public Comment. This waiver request was available for public comment concurrently with Indiana's Draft Unified State Plan prior to submission to USDOL/ETA for consideration. The waiver request was shared with several stakeholders, including each of Indiana's twelve local workforce development areas. The waiver request was highlighted on the Governor's Workforce Cabinet (GWC) and DWD websites. A copy of this waiver request is also maintained at DWD's central office for inspection upon request.

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.

Results and Outcomes data is woven throughout the information listed in Sections 1 – 6 of this waiver request.