

U.S. Department of Labor

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



May 28, 2024

The Honorable Mike DeWine
Governor of Ohio
30th Floor
77 South High Street
Columbus, OH 43215

Dear Governor DeWine:

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 Ohio will meet the outcomes and implement the measures identified in its plan to ensure accountability agreed to by Ohio 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 WIOA Section 129(a)(4) and 20 CFR 681.410 which require that local workforce development areas expend at least 75 percent of local area youth funds to provide services to OSY and calculation of the local area expenditure for each local area.

ETA Response: ETA approves for Program Year (PY) 2024 and PY 2025, which includes the entire time period for which local areas are authorized to spend each of those fund allotments, the State's request to waive the requirement that local areas expend 75 percent of local youth formula funds on OSY. Ohio may use both WIOA and TANF funds to count towards the 75 percent expenditure requirement. ETA reviewed Ohio'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. 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.

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 PY 2025, the State's request to waive the requirement limiting ITAs to only OSY, ages 16–24. In addition to these OSY, the State may use ITAs for ISY, ages 16–21. ETA reviewed Ohio'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 State's efforts to prioritize OSY, including outreach to the OSY population.

Requested Waiver: Waiver of WIOA Section 129(c)(4) and 20 CFR 681.590(b), to allow local workforce development areas to count both WIOA local youth formula funds and TANF funds toward the minimum 20 percent expenditure requirement for paid or unpaid work experience.

ETA Response: ETA approves for PY 2024 and PY 2025, which includes the entire time period for which locals are authorized to spend each of those fund allotments, the State's request to allow local areas in the State to count both WIOA Youth and TANF expenditures toward the 20 percent expenditure requirement for paid or unpaid work experience for youth co-enrolled in those programs. ETA reviewed Ohio's waiver request and plan and has determined that the requirements requested to be waived impede the ability of Ohio to implement its plan to improve the workforce development system. In addition to WIOA local youth program funds spent on paid and unpaid work experiences, including wages and staff costs for development and management of work experiences, local areas in Ohio may include TANF work experience expenditures in the calculation of the 20 percent work experience expenditure requirement.

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: Matt Damschroder, Director, Ohio Department of Job and Family Services
Pam Gerassimides, ETA Regional Administrator – Region 5 Chicago
Carl Stahlheber, ETA Federal Project Officer

Ohio 2024 Waiver Requests

Ohio is applying for three waivers as follows:

Waiver 1: Allow TANF funds to count toward the 75 percent expenditure requirement on out-of-school youth and to calculate the expenditure requirement on a statewide basis.

- 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 and how those goals relate to the Combined State Plan.**

Section 129 (a)(4) and 20 CFR 681.41 requires that local workforce development areas must expend a minimum of 75 percent of WIOA youth funds on out-of-school youth. Ohio would like to waive the requirement to allow for the inclusion of a percentage of TANF funds as part of the 75 percent expenditure for out-of-school youth requirement. Additionally, as part of this waiver, Ohio would like to calculate this expenditure requirement on a statewide basis. Ohio is requesting this waiver for PY24 and PY25- July 1, 2024-June 30, 2026.

Under CCMEP, with its emphasis on co-funding to benefit more cost-effective service delivery, the number of disconnected youth who can be served will increase, particularly given the large infusion of TANF dollars. This will ultimately allow WIOA youth dollars to have a further reach and greater impact in local communities. Additionally, by allowing the calculation of the expenditure rate to be statewide, there would be more flexibility amongst all the local workforce development areas to serve the population of participants unique to that local area.

To recognize the influx of TANF dollars being invested in the WIOA out-of-school youth (OYS) population under CCMEP, ODJFS will include the amount of TANF dollars spent on co-enrolled WIOA OSY during a program year in both the numerator and denominator of the OSY rate calculation. We will continue to utilize the formula proposed as the alternative calculation, starting with PY 20 funds.

Proposed OSY Rate Calculation Under Waiver Authority	
WIOA OSY expenses	TANF spent on co-enrolled WIOA OSY
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Total WIOA OSY + ISY expenses	+ TANF spent on co-enrolled WIOA OSY

The example below compares the OSY rate calculation under current WIOA law to the proposed waiver flexibility for a local area that spent \$400,000 of its \$600,000 in PY18 WIOA Youth program funds during the two years of availability as well as \$200,000 of its CCMEP TANF funds spent during the second year of the Youth grant on services for OSY who are co-enrolled:

<p><i>Of \$600,000 in Youth spending, \$400,000 was spent on OSY:</i></p> <table style="margin-left: auto; margin-right: auto;"> <tr> <td style="text-align: right;"><u>\$400,000</u></td> <td></td> </tr> <tr> <td style="text-align: right;">\$600,000</td> <td></td> </tr> <tr> <td></td> <td style="text-align: right;">= 67%</td> </tr> </table>	<u>\$400,000</u>		\$600,000			= 67%	<p><i>The area also invests \$200,000 of its TANF funds on co-enrolled OSY WIOA youth:</i></p> <table style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: left;"><u>WIOA</u></th> <th style="text-align: left;"><u>TANF</u></th> <th></th> <th></th> </tr> </thead> <tbody> <tr> <td style="text-align: right;"><u>\$400,000</u></td> <td style="text-align: right;"><u>\$200,000</u></td> <td style="text-align: center;">+</td> <td></td> </tr> <tr> <td style="text-align: right;">\$600,000</td> <td style="text-align: right;">\$200,000</td> <td></td> <td style="text-align: right;">= \$600,000</td> </tr> <tr> <td></td> <td></td> <td></td> <td style="text-align: right;">\$800,000</td> </tr> <tr> <td></td> <td></td> <td></td> <td style="text-align: right;">= 75%</td> </tr> </tbody> </table>	<u>WIOA</u>	<u>TANF</u>			<u>\$400,000</u>	<u>\$200,000</u>	+		\$600,000	\$200,000		= \$600,000				\$800,000				= 75%
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The waiver supports the principles of streamlining services, increasing accountability and accessibility, State and local flexibility and ease of administration. Furthermore, this waiver supports the implementation of CCMEP by using both WIOA and TANF funding sources together to support the different needs of the same customer while easing administrative burden associated with managing two different Federal funding streams.

It should be noted that the LWDB still maintains the authority to determine how to fund the WIOA youth program, including how much funding should be dedicated to the WIOA in-school and out-of-school programs.

2. Describe 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.

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

Using this waiver, Ohio's statewide out of school youth expenditure rate for the PY 2021 funds was 86.1% and for the PY 2022 funds it was 82.4%. The number of WIOA participants co-funded with TANF dollars was 4,821, which was an increase from the previous program year (4,721 participants). Also, the overall percentage of co-funded participants increased from 24.9% to 25.7% in PY 2022.

Although the pandemic and the increasingly tight labor market decreased out of school enrollment, Ohio has been working with local workforce areas to amplify outreach and to develop strategies to boost enrollment of this population through training and technical assistance. ODJFS has been working with a marketing firm to develop a social media toolkit and videos to help with outreach which we anticipate releasing early in 2024.

Ohio is also anticipating increases in our WIOA youth outcomes. With the implementation of CCMEP, the WIOA youth outcomes pertaining to employment and training 2nd and 4th quarter after exit have consistently been above 70%. The Median earnings number has consistently increased every year. For example, in PY 17, the employment and training 2nd quarter after exit was 71.9%. In PY 18, this same measure was 75.3%. PY 19's data for this measure was 75.7%; in PY 20 it was 71.7% and most recently 70.1% in PY 21. Another example is median earnings. In PY 17, the median earnings number for youth was \$2,766. In PY 18, this same measure was \$2,856. PY 19's data was \$3,216, PY 2020 was \$3,300, and PY 2021 was \$3,457.

With increased co-enrollment and a delivery of services methodology that focuses on the individual, we anticipate that our outcomes will continue to increase while continuing to serve youth with multiple barriers to employment and training. Our goal is to increase enrollments back to pre-pandemic numbers, which would mean a projected outcome of serving 9,000 youth by the end of PY24.

1. Increase the number of WIOA funded youth participants;
2. Continuity and greater efficiency of service delivery;
3. Flexibility in deciding the funding source for CCMEP participants who are eligible for these separate funding sources;
4. Increase enrollment in youth populations which are harder to serve;
5. Increase the co-enrollment in WIOA and TANF so that youth have the full array of services and funding necessary to complete services;
6. Decrease in administrative costs to deliver services;

7. Increased percentage of youth who obtain employment or enroll in training and are able to maintain employment and/or training; and
8. Integration of WIOA and TANF services as part of the CCMEP program.

4. Describe how the waiver will align with the Department's policy priorities, such as:

- 1. supporting employer engagement;**
- 2. connecting education and training strategies;**
- 3. supporting work-based learning;**
- 4. improving job and career results, and**
- 5. other guidance issued by the Department**

Ohio's 2024 Combined State Plan identified four specific strategic goals:

1. Coordinate efforts across entities (public, private, local, and State) to reduce unnecessary duplication and maximize resources.
2. Leverage technology and data to create efficiencies and improve services and outcomes.
3. Deploy locally driven programs that produce results.
4. Invest in and promote education and training for jobs that
 - empower people with 21st Century skills and strengthen Ohio's strategic economic advantage, and
 - ensure that our State has a workforce to support the health and well-being of Ohioans, their families, and communities.

With the development of CCMEP, Ohio is pushing traditional program boundaries by integrating components of Ohio's TANF program with WIOA employment programs to create a better-coordinated, person-centered case management system. CCMEP takes a coordinated, holistic approach to stabilizing individuals and families by addressing the myriad of factors that may be contributing to poverty and unemployment, including health, housing, education, transportation, and childcare. In conjunction with supportive services, the program will provide access to employment and training services, including career counseling, job placement, and the fourteen program elements to facilitate job retention.

This waiver supports co-funding and coordination of services and provides more flexibility on how funding is allocated. Furthermore, this waiver would extend WIOA funds and allow resources to go further. It will allow CCMEP to serve more youth by allowing both TANF and WIOA funds to be used when calculating the 75 percent expenditure requirement for out-of-school youth.

The population of youth and young adults fluctuates across Ohio. The population in some local areas is high density with a lot of resources to serve this population. In other local areas in the State, particularly the rural and Appalachian areas, the population is lower and resources are minimal. The waiver to calculate this expenditure requirement on a statewide basis would provide flexibility in serving CCMEP participants, allow the LWDB to focus on the populations who need services the most, and reflect the populations of participants who should be served.

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

CCMEP serves TANF work-eligible recipients and WIOA in-school and out-of-school youth ages 14 to 24 years. By virtue of the program eligibility requirements, CCMEP is directly addressing service delivery for disadvantaged populations and individuals with multiple barriers to employment. This waiver will allow local areas to fund services in a manner which best meets the needs of the participant. The waiver to allow the use of TANF funds as part of the 75 percent expenditure requirement for out-of-school youth will allow additional funding flexibility so that both TANF and WIOA youth program funds can be used effectively and efficiently.

Furthermore, by allowing the 75 percent expenditure rate to be calculated on a statewide basis, the local areas may focus on serving the populations the LWDB has chosen to serve as well as the population of individuals who may benefit from the delivery of CCMEP services.

6. Describes the processes used to:

1. Monitor the progress in implementing the waiver;
2. Provide notice to any local board affected by the waiver;
3. Provide any local board affected by the waiver an opportunity to comment on the request;
4. Ensure meaningful public comment, including comment by business and organized labor, on the waiver.
5. Collect and report information about waiver outcomes in the State's WIOA Annual Report.

ODJFS will monitor implementation and impact of this waiver through a combination of reporting from the local level using the Advancement of Resources through Information and Employment Services (ARIES) system

and State monitoring, oversight, and evaluation functions. Monitoring of the waiver may be conducted through a variety of approaches that may include routine desk reviews and on-site compliance monitoring. ODJFS may also monitor the implementation of this waiver through feedback from local workforce development areas and review of all fiscal data systems. Meetings between ODJFS staff and local board directors are held on a regular basis, which serves as a venue to address any issue with the implementation of this waiver.

In addition to monitoring, The USDOL Behavioral Insights team, which includes researchers from the American Institutes for Research, worked with approximately 10 Ohio counties to design, implement, and assess a texting behavioral intervention to encourage CCMEP participants to maintain engagement in the program and benefit fully from available program services. Selected CCMEP participants were randomly placed in either one of two groups: intervention (treatment) or no intervention (control). Participants in the treatment group received encouraging text messages once per week over 12 weeks to foster engagement and prompt continuation with the CCMEP program. Outcome measures, including services received and completed, were compared for the two groups to understand the effectiveness of utilizing an external prompt (the text messages) on CCMEP participants' engagement and success."

The study learned that a sustained messaging effort can increase participant service use and the service completion rates among youth. Also, the study learned that these impacts vary based on population characteristics. On an operations feasibility front, the study showed that text messages can be incorporated at relatively low cost for the state and counties that already have access to mass messaging technology. This confirmed that automation can play a constructive role in supplementing staff outreach efforts. It requires careful and thoughtful design with input from customers of the program.

Additionally, the WIOA annual report published each year and provided to USDOL will include a section related to the effects of this waiver showing a recalculation of the statewide OSY rate to include the TANF funds spent on co-enrolled OSY during the program year being reported.

Workforce development stakeholders, including local boards, businesses, and organized labor organizations, were notified of the proposed waiver request through an e-mail alert. The e-mail alert contained instructions on how to submit comments. In addition, both the general public and stakeholders had access to the waiver request on the OWD website.

7. Provide 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.

See information in above responses.

Waiver 2: Allow the use of individual training accounts (ITA) for in-school youth, ages 18-21 years.

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 and how those goals relate to the Combined State Plan.

20 CFR 681.550 allows ITAs funded by WIOA youth funds to be used by out-of-school youth. The final rule did not expand the use of ITAs to in-school youth. Instead, in-school youth wishing to access ITAs may only do so through the WIOA adult program. Ohio would like to waive the requirement to only allow ITAs for out-of-school youth and expand this flexibility to in-school youth.

The intent of using ITAs in the WIOA out-of-school youth program is to expand training options, increase program flexibility, enhance customer choice, and reduce paperwork. Ohio would like in-school youth to also have this option. This waiver encourages this youth population to seriously look at career pathways and in-demand occupations and empowers them to make their own decisions, thereby taking responsibility for their actions.

This waiver request supports the principle of accountability and ease of administration. Co-enrollment in the WIOA adult program would not be necessary under this waiver. The ITA could be issued from one funding source and will increase accountability.

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.

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

Ohio expects to achieve the following goals and programmatic outcomes:

- Improve the ability of LWDBs, youth program providers, and CCMEP lead agencies to respond quickly to the needs of in-school youth;
- Increase the quality of learning opportunities;
- Increase employment and training opportunities;

- Improve coordination by reducing fragmentation of service delivery;
- Improve customer choice and increase empowerment for youth, making them capable and responsible for making thoughtful choices about their career;
- Reduce unnecessary paperwork;
- Develop the emerging workforce with prepared candidates ready for work; and
- Increase accountability.

During PY 2020, ITAs were provided to 552 in-school youth. That was an increase from the last program year, which was 491. In PY 2021, we have served 588 in-school youth with an ITA (Participant counts based on Quarters 1-3) We anticipate serving 615 in-school youth by the end of PY23. Without the approval of this waiver, we will be unable to serve any in-school youth with an ITA. Ohio is unable to provide more recent data at this point due to a recent transition in case management systems. Ohio is requesting this waiver for PY24 and PY25- July 1, 2024-June 30, 2026.

4. Describes how the waiver will align with the Department’s policy priorities, such as:

- 1. supporting employer engagement;**
- 2. connecting education and training strategies;**
- 3. supporting work-based learning;**
- 4. improving job and career results, and**
- 5. other guidance issued by the Department.**

In the WIOA Final Rule, the intent of using ITAs in the WIOA out-of-school youth program is to expand training options, increase program flexibility, enhance customer choice, and reduce paperwork. Ohio would like in-school youth to also have this option. This waiver encourages this youth population to seriously look at career pathways and in-demand occupations and empowers them to make their own decisions, thereby taking responsibility for their actions. The waiver not only helps WIOA Youth to have an opportunity to graduate high school even if their standardized test scores do not meet the state’s requirements since an industry-recognized credential can serve as a substitute for minimum required scores, but it also assists in the preparation of an emerging workforce with candidates who are ready for work.

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

WIOA in-school youth participants will benefit from this waiver. In Ohio, CCMEP serves TANF work-eligible recipients and WIOA in-school and out-of-school youth. By virtue of the program eligibility requirements, CCMEP is directly addressing service delivery for disadvantaged populations and individuals with multiple barriers to employment. This waiver also helps youth at risk of not graduating high school by providing another opportunity to qualify for a high school diploma. This waiver will allow this youth population to seriously look at career pathways and in-demand occupations, increase training and employment opportunities for this population of youth, and empower youth to make their own decisions.

6. Describe 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.**

Report.

ODJFS will monitor implementation and impact of this waiver through a combination of reporting from the local level using the Advancement of Resources through Information and Employment Services (ARIES) system and State monitoring, oversight, and evaluation functions. Monitoring of the waiver may be conducted through a variety of approaches that may include routine desk reviews and on-site compliance monitoring. ODJFS may also monitor the implementation of this waiver through feedback from local workforce development areas and review of all fiscal data systems. Meetings between ODJFS staff and local board directors are held on a regular basis, which serves as a venue to address any issue with the implementation of this waiver.

Workforce development stakeholders, including local boards, businesses, and organized labor organizations, were notified of the proposed waiver request through an e-mail alert. The e-mail alert contained instructions on how to submit comments. In addition, both the general public and stakeholders had access to the waiver request on the OWD website.

7. Provide 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.

See information in above responses.

Waiver 3: Allow TANF funds to count towards the 20 percent work experience expenditure requirement.

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 and how those goals relate to the Combined State Plan.

The Ohio Department of Job and Family Services (ODJFS) is the state workforce agency. In that capacity, ODJFS is seeking a waiver from provisions in 20 CFR 681.590 (b) that requires tracking WIOA youth program funds spent on paid and unpaid work experiences as calculated based on the total local area WIOA youth funds and report such expenditures as part of the local WIOA youth financial reporting.

Ohio is requesting a waiver to include TANF work experience wages towards the 20% requirement in addition to WIOA youth program funds spent on paid and unpaid work experiences, including wages and staff costs for development and management of work experiences. The purpose of this waiver is to increase participant enrollment in work experiences by having TANF funded, co-enrolled participants count towards the 20% requirement defined in 20 CFR 681.590. The waiver supports the principles of streamlining services, increasing accountability and accessibility, state and local flexibility and ease of administration.

If TANF funds are used for a co-enrolled youth's work experience wages, we would like to add those funds to the numerator and denominator of the existing 20% work experience calculation. WIOA paid youth wages for work experience

+ WIOA staff costs for development and maintenance of work experiences

+ TANF paid youth wages for co-enrolled work experience

= Total Work Experience Calculation

By allowing the State of Ohio to include TANF work experience wages, the local area will not be limited to just WIOA Youth program funds when developing work experience opportunities.

This will allow for more youth to be served in the WIOA Youth program, more work experiences to be developed and ultimately better outcomes for co-enrolled WIOA and TANF youth.

Without this waiver, the local areas may be reluctant to develop work experiences funded with TANF dollars because it negatively affects their 20% work experience requirement. Approval of this waiver will ultimately benefit both programs, grow overall work experience enrollments, and increase access to services for our participants.

2. Describe 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.

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

Ohio expects to increase the percentage of WIOA youth funds used for work experience as a direct result of this waiver. We anticipate an increase in the State-wide percentage and an increase in each local area. Ohio anticipates that with approval of the waiver, there will be an increase to the work experience percentage that exceeds the 20% minimum.

For PY 2020, Ohio's youth programs (TANF, WIOA, and co-enrolled) had a total of 18,942 participants. Of those, **8,465** (44.7%) were enrolled in work experience programs. For PY 2021, Ohio's youth programs had a total of 18,779 participants. Of those, **8,022** (42.7%) were enrolled in work experience programs. For PY 2022, Ohio's youth programs had a total of 18,845 participants. Of those, **7,872** (41.8%) were enrolled in work experience programs.

Although the number of work experiences did not increase in the last program year with this waiver, Ohio continues to provide training and technical assistance about this waiver and methods for increasing outreach and enrollment to ensure work experiences will increase over the next two program years. Ohio is projecting a 5% increase in the rate of the number of enrolled youth who receive a work experience service.

4. Describe how the waiver will align with the Department's policy priorities, such as:

- **Supporting employer engagement;**
- **Connecting education and training strategies;**
- **Supporting work-based learning;**
- **Improving job and career results, and**
- **Other guidance issued by the Department.**

Ohio's 2024 Combined State Plan identified four specific strategic goals:

1. Coordinate efforts across entities (public, private, local, and State) to reduce unnecessary duplication and maximize resources.
2. Leverage technology and data to create efficiencies and improve services and outcomes.
3. Deploy locally driven programs that produce results.
4. Invest in and promote education and training for jobs that
 - empower people with 21st Century skills and strengthen Ohio's strategic economic advantage, and
 - ensure that our State has a workforce to support the health and well-being of Ohioans, their families, and communities.

Approval of this waiver will directly impact Goal #2. Our data shows that Ohio's local workforce areas are successfully co-enrolling participants in WIOA and TANF. The reporting also suggests that with the ability for TANF enrollments to count towards the work experience percentage, a larger number of participants will eventually receive this valuable service with continued training and technical assistance for our areas. Work-based learning services have been shown to propel young adults towards self-sufficiency with improved long-term outcomes.

This waiver would also directly impact Goal #1. By allowing the flexibility for local workforce development areas to co-enroll TANF eligible and Title I youth program eligible participants they are better able to utilize funding in a manner that is most cost-effective and in a way that maximizes resources. Taking advantage of the TANF funds also helps to reduce the impact of diminishing WIOA Youth funding allocations for Ohio's workforce areas.

The U.S. Department of Labor FY 2022-2026 Strategic plan, Strategic Goal 1, ETA Strategic Objective 1.1 is, Create customer-focused workforce solutions that serve all workers, including underserved communities.

ETA plans to prepare America's workers for the jobs of the 21st century by investing in high-quality workforce training programs and expanding access to underserved communities.

This includes expanding and increasing access to Registered Apprenticeship and effective work-based training. Work-based learning programs where youth receive wages are shown to have positive employment outcomes, labor force participation, and wage and earning increases.

This proposed waiver directly correlates with the Department of Labor priority to expand opportunities for work-based learning.

Approval of this waiver will greatly increase access to work experience opportunities because the local areas will be able to use both WIOA Youth funds and TANF funds for paid work experiences. With both programs offering paid work experience for youth, more youth in Ohio will gain experience that will improve employment outcomes and wages, as they transition into the unsubsidized labor force.

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

Individuals enrolled in the WIOA youth program will directly benefit from this waiver. Approval of this waiver will allow more youth with barriers to ultimately be served in Ohio's youth program. By virtue of the program eligibility, CCMEP is directly addressing service delivery for disadvantaged populations and individuals with multiple barriers to employment. This waiver will allow local areas to fund services in a manner that best meets the needs of the participant.

Ohio businesses will also benefit from approval of this waiver. According to the [Short Term Forecast \(2022-2024\)](#) report using data derived from Ohio Labor Market Information, the top five occupations in Ohio with the most annual openings are Laborers (Freight and Stock), Stockers and Order Fillers, Cashiers, and Retail Salespersons. These occupations generally operate within business hours that are conducive to youth participants. Upon approval of this waiver, Ohio will seek to enroll more youth in work experiences and assist Ohio businesses in filling crucial roles needed to operate successfully.

6. Describe the processes used to:

- **Monitor the progress in implementing the waiver;**
- **Provide notice to any local board affected by the waiver;**
- **Provide any local board affected by the waiver an opportunity to comment on the request;**
- **Ensure meaningful public comment, including comment by business and organized labor, on the waiver.**
- **Collect and report information about waiver outcomes in the State's WIOA Annual**

Report.

Local areas are currently required to report WIOA youth work experience dollars as part of their monthly expenditure reports. Local areas will continue to report these expenditures and each local area will be required to report on any dollars from TANF funds used for work experiences as a separate category. Combining the WIOA youth work experience dollars with the TANF work experience dollars will create an overall youth experience percentage.

All local areas will be notified once the waiver is approved and be given formal reporting instructions.

Annual WIOA on-site programmatic reviews will include an evaluation of how local waivers are being utilized to ensure programmatic goals and outcomes are being met.

Workforce development stakeholders, including local boards, businesses, and organized labor organizations, were notified of the proposed waiver request through an e-mail alert. The e-mail alert contained instructions on how to submit comments. In addition, both the general public and stakeholders had access to the waiver request on the OWD website.

7. Provide 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.

See information in above responses.