

U.S. Department of Labor

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



May 30, 2024

The Honorable Ned Lamont
Governor of Connecticut
State Capitol
210 Capitol Avenue
Hartford, CT 06106

Dear Governor Lamont:

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 request was 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 Connecticut will meet the outcomes and implement the measures identified in its plan to ensure accountability agreed to by Connecticut 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 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 local formula youth funds on out-of-school youth (OSY).

ETA Response: ETA approves for Program Year (PYs) 2024 and 2025, the State's request to waive the requirement that local areas expend 75 percent of local youth formula funds on OSY. Connecticut may lower the local youth funds expenditure requirement to 50 percent for OSY for the Northwest and Southwest Workforce Development Boards: Northwest Regional Workforce Investment Board and the Workplace, Inc. 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,

José Javier Rodríguez

Enclosure

cc: Danté Bartolomeo, Commissioner, Connecticut Department of Labor
Gregg Weltz, ETA Regional Administrator – Boston Region
Phoebe Reeves, ETA Federal Project Officer



Connecticut Waiver Request

1. The statutory and/or regulatory requirements the state would like to waive;

The state aims to waive the current WIOA out-of-school youth expenditure requirement of 75% to 50% (WIOA Sec. 129 (a)(4)(A)) for the local Northwest and Southwest Workforce Development Boards: Northwest Regional Workforce Investment Board and the WorkPlace, Inc. The expenditure requirement for out-of-school youth prevents the state from being responsive and agile to support all youth as Connecticut's economy recovers from a pandemic and seeks to decrease the rate of disconnection among marginalized youth. The other regions already have a presence for in school and out of school programming in WIOA (Eastern Workforce Investment Board, Inc. and The Workforce Alliance, Inc.) or the WIOA fund use exclusively prioritizes the Out of School population (Capital Workforce Partners, Inc.).

2. Actions the state has undertaken to remove state or local barriers;

To eliminate state or local barriers, the state continues to conduct a comprehensive review of existing policies and engaged in consultations with local stakeholders to identify and address obstacles hindering the effective provision of services to both in-school and out-of-school youth. For example, where funding is available, the state is supportive of new outreach and recruitment methods to find youth (such as social media campaigns and on-site locations in schools or areas where youth congregate outside of the standard brick and mortar AJC) as well as increasing supportive services and mentorship opportunities for youth. The state, in alignment with USDOL guidance, allows funding to support eligibility needs, has expanded access in data sharing agreements from partnering agencies, and is encouraging the use of self-attestations.

3. A description of the state's strategic goal(s);

The state's strategic goal is built on foundational pillars of aligning workforce systems, serving marginalized communities, and using data to drive decision making through transparency and accountability. The state is expanding education to career pathways from high school to post-secondary education or sector based trainings. The goal for pathways is to lead to high quality, sustainable jobs that pay competitively. As an additional driver to this need, in 2022, it was identified that one in five of Connecticut's young people were either at-risk or disconnected. These are 119,000 young people who have either dropped out of school or are in danger of dropping out of school. (Report from Dalio Education, accessible online: <https://www.dalioeducation.org/report/>). As a result of this report and the foundational strategies to align workforce systems, Connecticut is focused on supporting at-risk in-school students to avoid disconnection, and leverage resources to continue to serve disconnected youth across many workforce systems including WIOA.

Our goal through this waiver request is to expand In School Programming in regions where it does not currently have a WIOA presence with the flexibility of funding to start up new programs in an equal approach as opposed to 75% of the funding on the Out of School population. As the state grows more In School programs, our goal is to reduce the number of students dropping out. Additionally, for those students who do choose to drop out for varied family, personal, or financial reasons, we aim to support those students in alternative pathways to obtain a GED and stay connected to workforce activities. We believe this dual approach can reduce the overall number of disconnected youth in our state.

4. A discussion of how the waiver complements Department of Labor priorities (i.e. expansion of apprenticeship, improved employer engagement, etc.);

The waiver request complements Labor priorities as it will create a balanced approach to youth services by engaging more youth to stay in school and avoid disconnection to education and workforce systems. Youth at risk of dropping out typically have multiple barriers to education and/or employment, including low-income youth, young parents, homeless, previously incarcerated, and youth with disabilities, so serving this population aligns with Labor, state, and Workforce Development Board goals. Access to opportunities also encompasses technology and internet access, which many families do not have to stay connected to education, and the Workforce Development Boards have already been providing this access prior to the pandemic but will leverage complementary grants to ensure students have the tools and supports to achieve their education and career goals.

The waiver aligns with Department of Labor priorities by promoting a more flexible allocation of funds, allowing for the expansion of career pathway and supportive youth programs, and enhancing employer engagement. This shift supports broader workforce development initiatives.

Specifically, this waiver request seeks to support students in the following:

- Supporting students to increase attendance in school and programming.
- Informing students of available supports and providing access to local supportive services such as access to technology or hardware, mental health, substance use, housing, basic needs, or other supports identified by need.
- Supporting and encouraging students in school and programming in order to show an increase in performance.

5. Quantifiable projected programmatic outcomes resulting from implementation of the waiver;

Projected outcomes include increased participation of in-school youth in WIOA programs, improved educational attainment rates, enhanced job readiness, and a reduction in the overall rate of youth disconnection. The approval of this waiver has the potential to prevent high school dropouts by providing mentorship and support services including mental health or substance use resources, intervention strategies, and technology access.

As we emerge from the pandemic, many students fell further behind or dropped out altogether. Connecticut Youth are facing mental health struggles at an alarming rate, and this impacts their ability to succeed in the classroom. To respond to these emerging issues, Connecticut proposes to focus a portion of its youth services on dropout prevention for in-school youth and to serve all at-risk youth, regardless of school status.

PY24 quantifiable goals:

Based on the individuals served, the regions will strive for:

- 65% of Participants will show an Increase School Attendance (defined as fewer reported unexcused absences in a determined time period).
 - 60% Engagement in support services (defined using provided hardware/technology for engagement in services or a participant's pursuit of a referred support service such as mental health, substance use, or other supports).
 - 60% Increase in a Grade Level Performance (defined as a reported improvement in a report card in a subject, overall grade point average improvement, or the improvement in education functioning level from a recognized assessment test).
- 6. Individuals, groups, or populations benefitting, or otherwise impacted by the waiver from the waiver;**

This waiver is intended to benefit at-risk youth, regardless of school status, with an emphasis on youth at risk of dropping out of high school, GED, alternative, and post-secondary education programs.

- 7. How the state plans to monitor waiver implementation, including collection of measurable waiver outcome information;**

CTDOL has comprehensive programmatic and fiscal monitoring procedures and a performance accountability system that measures and evaluates results for participants enrolled in WIOA programs. On a monthly and quarterly basis, CTDOL will review and analyze enrollment and service levels, program expenditures, and performance outcomes in coordination and collaboration with the regional Workforce Development Boards participating in the waiver. In addition, State program monitors conduct quarterly reviews designed to assure that contract requirements are being met for all WIOA programs. On an annual basis, comprehensive compliance monitoring is conducted. These reviews include the Youth program strategies, services, and expenditure plans. The metrics outlined in this waiver request will be tracked by the Workforce Development Boards in the state's performance accountability system. Should this waiver request be granted, CTDOL will regularly monitor the impacts of this waiver authority to ensure appropriateness and effectiveness. Measurable Skills Gains will be reported when an education functioning level increase is increased or compliant attendance has continued for a full semester to define a milestone. CTDOL will report on the outcomes in the WIOA Annual Report.

- 8. Assurance of state posting of the request for public comment (including the dates that the state made the draft request available for public comment) and notification to affected local workforce development boards.**

The state assures transparency by posting the waiver request for public comment, specifying the dates of availability for public review. Affected local workforce development boards will be notified to ensure their input is considered in the decision-making process. Electronic copies of the waiver were sent via email to local boards and one-stop operators.

