

## ATTACHMENT 1

### FLORIDA'S ABBREVIATED WAIVER REQUESTS for 2007-2008

For the two-Year WIA State Plan 2007-2008 period, Florida is requesting an extension of the waivers previously granted during 2005-2006. Those waivers are summarized below, along with a brief rationale for the extension. Waiver #3 was not granted last year, but is being requested again. Additionally, Florida is requesting a revision to Waiver #5 as submitted on June 28, 2007.

#### **Waiver #1: To permit a mid-year de-obligation and reallocation of local area funds:**

*Rationale:* This waiver ultimately results in an increase in the rate of investment of WIA funds. Local Workforce Boards experiencing under-expenditures are not unduly jeopardized by the deobligation of unneeded funds as they become eligible to participate in subsequent redistributions of funds based on improved performance and increased needs within their areas. Overall, the waiver provides for a more effective distribution, use, and investment of WIA funds, thereby ensuring that such funds are spent within the workforce system where they are most needed. This waiver has been revised to clearly state that the deobligation and reallocation of WIA funds will be done solely on the basis of expenditures and not obligations.

#### **Waiver #2: To permit 100 percent transfer between Adult and Dislocated Worker funding streams:**

*Rationale:* The increase in transfer authority will continue to provide local workforce boards with greater flexibility in responding to changes in their local labor markets, and will help ensure that the WIA funds allocated to each local area are being utilized in a way that best serves the needs of the local customers. Additionally, this flexibility also allows local workforce boards to better respond to growing employer demand for Employed Worker Training, which can be funded at the local level only with WIA Adult funds. This increased flexibility also allows local workforce boards greater responsiveness to deal with massive worker dislocations; i.e., Florida recently experienced following the series of hurricanes and tornadoes.

#### **\*Waiver #3: Exemption from Wagner-Peyser "Merit Staffing" Requirement:**

*Rationale:* The proposed rule in the December 20, 2006 Federal Register, which deletes the requirements for WP merit staff, exemplifies Florida's quest for a truly seamless one-stop career center system that provides maximum flexibility and total integration of services. Florida believes the waiver is also necessary in delivering employment services with limited resources as it allows the local boards to decide what employees to hire, what skill level to recruit, how to train, supervise, discipline, direct and terminate as needed.

**Waiver #4: Data Capture Requirements Impacting Skills Upgrade Training for the Employed Worker Training (EWT) Program:**

*Rationale:* Continuation/extension of this waiver will allow the State to continue to streamline the data capture requirements to ensure that employers are not unnecessarily burdened with federal data requirements. Additionally, the waiver strengthens the ability of local workforce boards to coordinate workforce investment activities with economic development strategies and develop employer linkages. One of the primary reasons that local workforce boards provide EWT is to improve their regional economies by upgrading the skills of their existing workforce, enabling both the employer and the individual worker to improve their competitiveness. Additionally, as workers improve their skills and climb the career ladder, it enables the local workforce board to backfill those vacancies. Thus, the program builds employer usage and satisfaction of the public workforce system.

**Waiver #5: Allows local workforce boards to expand Employed Worker Training (EWT) activities by allowing up to 20 percent of local adult and dislocated worker funds to be expended on incumbent work training activities and by allowing state level rapid response funds to be used for allowable state level activities other than administration.**

Note: Florida is requesting a revision to its earlier waiver request submitted on June 28, 2007. The proposed revision would also allow the State to use 100 percent of state level rapid response funds for allowable state-level activities other than administration instead of being limited to 20 percent.

*Rationale:* The waiver encourages local workforce boards to further expand EWT activities, which promotes use of the public employment system through a demand-driven, business focus. The waiver also promotes maximum investment of these limited funds and increases levels of service as well as strengthens regional economies by focusing on employer and worker competitiveness through skills upgrade training. Additionally, all WIA customers are positively impacted as increased numbers of individuals that are in need of service will be provided service. Also, local workforce boards, identifying unmet needs or experiencing the sudden need for increased services in their areas, will have more timely access to additional resources. This also results in an increase in the rate of investment of WIA funds as well.

**Waiver #6: Allows older out-of-school youth to select an approved Individual Training Account (ITA) program from Florida's Eligible Training Provider list while retaining their youth classification.**

*Rationale:* The waiver allows older youth to pursue their occupational goals without the additional barrier of having to meet adult or dislocated worker eligibility requirements. The waiver also eliminates duplication of paperwork for enrolling older youth into the adult programs and benefits training providers as they no longer have to follow two separate processes to provide services to Adult/Dislocated Worker and Older

Worker/Youth. It also allows local workforce boards to improve their expenditures on out-of-school youth and meet the federal mandate to expend 30 percent of youth funds for this population. The waiver allows local workforce boards more flexibility in delivering services based on the individual needs of participants as intended under WIA.

**Waiver #7: Allows the State to use local adult and dislocated worker formula funds to be expended on entrepreneurial training with performances to be tracked at the state-level but not aggregated with other local performance data.**

*Rationale:* The waiver encourages the collaboration with economic development organizations, business, industry associations, and education to foster business innovation, small business startups and expansions and job creation. The waiver also helps the State in its recovery from the impacts of hurricanes, tornadoes and tropical storms which continue to be a State challenge. Local workforce boards, identifying unmet needs or experiencing individuals interested in self-employment opportunities in their areas will have continued flexibility to refer these persons to entrepreneurial training without fear or adverse impacts on local performance data.

**Waiver #8: Increased core services capabilities at local one-stop career centers - allows any one-stop career center staff who are funded by either WIA or WP to perform participant intake and eligibility determination for other supportive workforce programs without having to cost allocate staff time for each respective program.**

*Rationale:* One-stop career center customers benefit from an increased level of services available at the One-Stops as the customers do not have to expend extra time and effort to go to other non-WIA and WP funded staff for intake and eligibility determination for their enrollment in other supportive workforce programs. The waiver also increases the number of individuals coming into the one-stop career centers, thus increasing the number of individuals who can benefit from the workforce services offered at the one-stops.