

State of Florida
Workforce Investment Act
Waiver #9 – Continuation Request:

ADOPTION OF COMMON MEASURES

Pursuant to WIA Section 189(i)(4)(B) and the WIA Federal regulations at 20CFR 661.420, the State of Florida requests a continuation of the waiver to allow the State to replace the 17 WIA Title I performance measures (15 core and 2 customer satisfaction measures) with the common measures delineated in TEGL 17-05. If approved, the State of Florida would be allowed to continue to report outcomes solely under the nine common measures for all required federal reports for the current program year which began July 1, 2009 and beyond. This would allow Florida to continue report the common measures for programs under the Workforce Investment Act, the Wagner-Peyser Act, the Jobs for Veterans Act, and Trade Adjustment Assistance (TAA) programs. These nine common measures as outlined in the TEGL are: Entered Employment, Retention, Average Earnings, Youth Placement in Employment or Education, Youth Attainment of a Degree or Certificate, and Youth Literacy and Numeracy Gains.

This waiver would allow Florida to continue to avoid the inconsistencies and complexities inherent in the current WIA performance reporting requirements. It would allow the state to continue to effectively align accountability across all programs within our workforce system. The common measures more effectively support the State's goals of promoting on-the-job training and customized training for adult workers including employed workers. They also more clearly target out-of-school youth and youth most in need as identified by USDOL's Youth Vision statement.

A. Statutory or Regulatory Requirements to be Waived

Florida seeks a waiver of requirements established in Sections 136(b)(2) and (c)(1) of the Workforce Investment Act of 1998, as well as accompanying regulations at 20 CFR 666.100(a) and 666.300(a), which specify the required state and local performance measures for WIA Title 1B programs. Florida also requests a waiver of the seventeen indicators of performance for activities authorized under sections 129 and 134 of the Workforce Investment Act.

Specifically, with approval of this request, the State would not be required to report the following WIA measures: WIA Adult and Dislocated Worker credential rates; participant and employer customer satisfaction; older youth measures, and younger youth measures.

B. Goals of the Waiver and Expected Programmatic Outcomes if the Waiver is Granted

The requested waiver is consistent with following principles of the national strategic direction as outlined in TEGL 13-06 as well as more recent United States Department of Labor issuances:

- Enhance an integrated service delivery system that focuses on services rather than programs;
- Advance a vision for serving youth most in need;
- Increase the use of flexibility provisions in WIA to design innovative programs that fuel regional economic competitiveness and create employment opportunities for career seeker customers; and
- Utilize an integrated and enhanced performance accountability system.

With the waiver Florida has seen and expects to see the following benefits:

- Simplified and streamlined performance measurement;
- Improved one-stop case manager integration through the use of common measures which capture the effectiveness of the workforce system across all partners;
- The provision of clear and more understandable information concerning all workforce partner programs;
- Enhanced capacity for Florida to continue to implement USDOL's youth vision, which focuses on out-of-school populations;
- Removal of the current disincentives for the provision of on-the-job training and customized training.

C. State or Local Statutory or Regulatory Barriers

There are no State or local statutory or regulatory barriers to implementing the requested waiver. As proposed the waiver is in accord with the intent of Florida State Statutes and strategic policy. Upon approval of this waiver the State will take the appropriate steps to incorporate the change into its policy.

D. Description of the Individuals Impacted by the Waiver

Approval of this waiver will positively impact all customers of Florida's workforce system by streamlining program measurement to aid program management and program improvement. The waiver will assist efforts to more fully integrate all partner programs involved in the workforce effort.

E. Opportunity for Public Comment and the Process for Monitoring Implementation of the Waiver

This waiver as originally approved in 2008 was proposed by the Florida Workforce Development Association (the State's association of region workforce board executive directors), as of result of discussions within its membership and discussions between the association, Workforce Florida (the State's state workforce board), and the Agency for Workforce Innovation (the state's administrative agency). The request for continuation of the waiver was also developed through such a collaborative effort. Public comment on the intent of the State to continue this waiver has been encouraged and received. Public

comment was solicited by email to state agencies, all regional workforce boards, service providers, and other interested parties.

The implementation of this policy will be monitored by Workforce Florida and the Agency for Workforce Innovation as they continue to monitor the performance of WIA, Wagner-Peyser, Veterans, Trade Adjustment, and other workforce partner programs as well as the overall progress towards the goals and objectives expressed in Florida's State plan. Information contained in Employ Florida, the State's integrated case management and information system will be reviewed and reported to the State's regional workforce boards and to Workforce Florida on a regular basis. Review of the implementation and application of policy related to the waiver will regularly be placed on the agenda of public meetings of Workforce Florida and its committees and at regularly scheduled meetings of Board members and staff, with partner agencies, representatives of regional workforce boards, one-stop operators, and other partners.