

ALABAMA WORKFORCE DEVELOPMENT SYSTEM

**Department of Commerce
401 Adams Avenue
Post Office 304103
Montgomery, Alabama 36130-4103**

October 19, 2021

GOVERNOR'S WORKFORCE INNOVATION DIRECTIVE NO. PY2021-05

SUBJECT: Local Area Program Year 2020 WIOA Annual Report

1. Purpose. To provide Local Areas with preparation guidance for the Program Year 2020 Annual Report.

2. Discussion. Workforce Innovation and Opportunity Act (WIOA) Section 185 requires each State to submit to the Secretary of Labor an Annual Report covering Statewide WIOA operations for titles I and III core programs. In order to assist the State of Alabama in the comprehensive preparation and timely submission of the State-level Narrative Annual Report, each local area is required to submit a corresponding local area-level narrative annual report to the State.

The U.S. Department of Labor (USDOL)/Employment and Training Administration (ETA) has instructed States to use Training and Employment Guidance Letter (TEGL) 5-18 issued on November 7, 2018 to prepare the annual report each year. The Narrative Annual Report from the State must be submitted to USDOL/ETA no later than December 1, 2021. In order to accommodate this requirement and allow time for review of local area annual reports, Local Workforce Development Area (LWDA) annual reports must be submitted to the Workforce Development Division by November 5, 2021.

General guidance regarding local area PY 2020 annual report content is provided below.

3. Action. Each Alabama Local Workforce Development Area shall submit to the Workforce Development Division, Attention: Danny Cheek, an annual report of WIOA Adult, Dislocated Worker, and Youth program activities conducted during Program Year 2020 (PY20), July 1, 2020 through June 30, 2021. Each report must include:

a. A discussion about the following State of Alabama's Waivers:

- Waiver of 20 CFR 681.550 to allow Individual Training Accounts (ITAs) to be used for in-school youth affected local area operations and performance, and. This waiver was originally approved on May 22, 2019 and renewed for Program Year (PY) 2020 and included in the PY20 WIOA State Plan.
- Waiver of 20 CFR 681.410 to lower the expenditure rate for out-of-school youth for the state overall, local areas, and statewide activities from 75% to 50% to serve more in-school youth by partnering with programs that serve at-risk in-school youth to lower the number of youths who drop out of school.

Please include information and discussion on the following:

1. Discuss how activities carried out under each approved waiver have made progress toward achieving the goals and performance outcomes as stated under the **Strategic Goals of the Waiver and Expected Programmatic Outcomes** listed under each waiver in the **State of Alabama PY20 Waiver Requests document attached.**
- b. A description of the local area's approach to customer satisfaction. This description should align with the local area's approach to one-stop certification described in 20 CFR 678.800.
- c. A discussion of progress made in achieving the local area's vision and goals as outlined in the local area's four-year plan, including plans to develop its workforce and meeting employer needs in order to support economic growth and economic self-sufficiency.
- d. A discussion of progress made in implementing sector strategies and career pathways. The discussion should also include the following: business engagement strategies, work-based learning (including apprenticeship), work experiences for youth and adults,

transitional jobs, and incumbent worker training strategies and policies if any.

- e. A discussion of any technical assistance needs of the local area.
- f. A discussion of the following:
 - 1. Promising practices that focus on employers, communities, and individuals.
 - 2. Lessons learned that focus on employers, communities, and individuals.
 - 3. PY 2020 Adult, Dislocated Worker, or Youth program participant “success stories,” i.e., narrative accounts detailing how WIOA program services have aided participants in the identification and achievement of their individual workforce development goals. Please provide at least one account for each category. Success stories for individuals with disabilities, veterans, the long-term unemployed, and any other individuals with limited language proficiency are encouraged. Please only provide first names of participants.
- g. A discussion of any challenges the local area faces, which may include policy, implementation, or other relevant challenges.
- h. A separate description of WIOA PY 2020 Adult, Dislocated Worker, and Youth program activities. Local areas must include an explanation of how the allocation of resources for adults, dislocated workers, and youth activities affected the outcomes and include a cost per participant for each funding stream/population.

Local area PY 2020 Annual Reports must be received at the Workforce Development Division by November 5, 2021.

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Local Area PY20 WIOA Annual Report

4. Contact.

Questions regarding WIOA Annual Reports should be directed to Danny Cheek, Workforce Development Division at (334) 353-5163 or daniel.cheek@commerce.alabama.gov.

Tammy Wilkinson

Tammy Wilkinson (Oct 19, 2021 12:28 CDT)

**Tammy Wilkinson, WD Division Director
Alabama Department of Commerce**

Attachments: TEGl No. 5-18

State of Alabama PY20 Waiver Requests

State of Alabama PY20 Waiver Requests

(e) Waiver Requests

Requested Waiver: Allow the use of individual training accounts (ITAs) for in-school youth, ages 14-21 years.

Statutory and/or regulatory requirements to be waived

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. Alabama would like to waive the requirement to only allow ITAs for out-of-school youth and expand this flexibility to in-school youth, ages 14-21 years.

The intent of using ITAs in the WIOA out-of-school youth program is to expand training options, increase program flexibility, and enhance customer choice. If the State of Alabama is going to offer an adequate supply of workers to in-demand industry and occupations, it cannot include only those who are determined to be out-of-school as part of that supply. Alabama needs a waiver to support those with post-secondary educational goals past high school. In-school youth deserve the same opportunities for support as those being served as out-of-school youth, and it would be a disservice to those in-school customers to not support them past their high school diploma or its equivalent. Although it has been recommended to close the enrollment of those in-school youth who graduate and then re-enroll them as an out-of-school youth for the purpose of assisting them with an ITA after age 18, this poses a risk that the customer may no longer be eligible under the barrier requirements. It also prevents the State of Alabama from serving youth customers who graduate early (at 16 or 17) under an ITA, even if they are enrolled as an out-of-school youth once they earn their diploma.

Providing occupational training to in-school youth via an ITA will maximize the service delivery capacity of the State of Alabama's WIOA Youth Program by allowing those youth that are focused on employment to have the same access as adults, dislocated workers, and out-of-school youth to the advantages of ITAs. ITAs for in-school youth will support several strategic goals in Alabama's State Plan:

1. Provision of occupational skills training activities to youth;
2. Participation of youth in apprenticeship programs through the use of ITAs for the classroom learning component of apprenticeship; and

3. Contributing to the achievement of Alabama's postsecondary attainment goal of adding 500,000 credential holders to the workforce and raising Alabama's labor force to the national average by 2025, especially creating career pathways for in-school youth.

The State of Alabama is requesting a renewal of this waiver, which was initially approved at the end of Program Year (PY) 2018. In the eleven months since the waiver was approved, approximately 30 in-school youth have been served who would not have been eligible for an ITA without the waiver. Most of these youth graduated high school at the age of 17 and would not have been eligible to receive services or an ITA as an adult or out-of-school youth. All of these youth are still currently enrolled, and performance data will be available at the end of PY 2019. Alabama plans to provide technical assistance to Local Workforce Development Areas (LWDAs) during the upcoming year to expand the use of this waiver.

State or Local Statutory Barriers

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

Strategic Goals of the Waiver and Expected Programmatic Outcomes

This waiver if granted would have a significant impact on all of the youth performance measures as well as increase the number of youth served in Alabama. We anticipate approximately 100 in-school youth will be served per year who would not be eligible for an ITA otherwise if this waiver is approved. The State overall and the majority of LWDAs have had difficulty meeting the Credential Attainment within a Year After Exit measure for youth. This waiver would assist the State and LWDAs in meeting this measure since in-school youth would be encouraged and provided the necessary tools through the program to complete their education and training, which would not only lead to valuable credentials for the youth but also increase the youth credential rate for the state. We anticipate that 50% of in-school youth enrolled in ITAs will earn a credential, which is 13 points higher than our requested 37% goal in PY 2020 for all youth. Additionally, the State and LWDAs would have increases in the number of Measurable Skills Gains (MSGs) since the in-youth would be involved in occupational, pre-apprenticeship, or apprenticeship training. We anticipate 45% of in-school youth enrolled in ITAs will obtain a MSG, which is 5.5 points higher than our requested goal of 39.5% in PY2020 for all youth. The State also expects Placed in Employment/Education Second Quarter (67.3%), Placed in Employment/Education Fourth Quarter (67.0), and Median Earnings Second Quarter (\$2,742.30) to be impacted in a positive way.

In addition to these programmatic outcomes, Alabama expects to achieve the following goals:

- Improve the ability of local workforce development boards, youth program providers, and workforce and education lead agencies to respond quickly to the needs of in-school youth, ages 14-21 years;
- Increase the quality of learning opportunities;
- Increase employment and training opportunities;
- Improve coordination by reducing fragmentation of service delivery;
- Increase the opportunities for work-based learning;
- Improve customer choice and increase empowerment for youth, making them capable and responsible for making thoughtful choices about their career;
- Reduce unnecessary paperwork;
- Develop an emerging workforce with prepared candidates ready for work; and
- Increase accountability.

Alignment with USDOL/ETA Policy Priorities

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. Alabama would like in-school youth, ages 14-21, to also have this option. This waiver encourages this youth population to seriously look at career pathways in the in-demand occupations and empowers them to make their own decisions, thereby taking responsibility for their actions. The waiver also assists in the preparation of an emerging workforce with candidates who are ready for work.

Description of Individuals, Groups, or Populations Impacted by the Waiver

WIOA in-school youth participants, ages 14-21 years, will benefit from this waiver. By virtue of the WIOA program's eligibility requirements, Alabama is directly addressing service delivery for disadvantaged populations and individuals with multiple barriers to employment. This waiver will enable the youth population ages 14-21 years 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.

Description of the Process to Monitor the Waiver Program and Collect Waiver Outcome Information

Upon USDOL's approval of the Four-Year Combined State Plan including this waiver request, the Alabama Workforce Development Board will communicate the waiver allowance to all its members and statewide partners.

The Workforce Development Division (WDD) of the Alabama Department of Commerce will revise applicable state level policy and ensure applicable operational guidance reflects the waiver allowance parameters. WDD will widely communicate these changes by posting revised policy on its public website. Additionally, WDD will communicate directly with all key stakeholders including the Local Workforce Development Areas (LWDAs) by way of email to announce the revised policy and other information important to convey regarding the waiver allowance. WDD will also establish new cost categories reflecting training attended by in-school youth, and project numbers assigned to these categories will be programmed into the state's workforce development financial record system to be able to account eligible youth participant costs.

WDD and the Alabama Department of Labor (ADOL), the current one-stop operator in each of the State's seven LWDAs, will launch a new unified case and data management system in April 2020, which will be used to track and report youth participant activities. However, until the launch of the new system, WDD will track and be able to report youth participant activities through its Alaworks data management system. Alaworks receives data from the Alabama JobLink case management and data system, which is the system currently used by ADOL. WDD will request for ADOL to add new data entry options for local case workers to account for the number of occupational, pre-apprenticeship and apprenticeship trainings authorized; data collected will include participant eligibility status, demographic data including age, program start and end dates and reported outcomes.

Also, case managers in the one-stop career centers will collaborate with subrecipient youth services providers as well as pre-apprenticeship and apprenticeship program sponsors. Case managers will maintain copies of necessary forms in youth participant case files. Case managers and/or WDD staff may request additional information from program sponsors or employers as necessary.

In addition, WDD will coordinate to revise statewide ETPL operational procedures and field guidance to account for these in-school programs accordingly. This includes pre-apprenticeship and apprenticeship programs.

Youth In-School ITAs will be delivered to youth primarily at the local level. If a local board decides to offer ITAs for eligible in-school youth, ages 14 - 21 at time of program enrollment, the board will amend their local ITA policy accordingly and may amend any other local policies impacted by this waiver as need be. As is the case with WIOA funded activities, the local board is responsible for oversight and monitoring. The local board will ensure local area policies pertaining to this waiver allowance and ITAs will be adhered to by all parties concerned. The local board is responsible to communicate relevant information to local stakeholders, Alabama Career Center System staff and partners, lead agencies and youth program providers. Local case workers will be directed to document the use of an ITA in each eligible youth's individual

service strategy, which contains the goals and objectives for the youth's participation in WIOA programs and activities as well as the participant service plan. Per existing policy and operational procedures, youth participant service activity must be recorded in the Alabama JobLink case management system (with data subsequently captured by AlaWorks) including ITA-related training, supportive services, follow-up and outcomes.

For any Youth In-School ITAs funded at the State level out of Governor's 15% funds, the WDD State Program Integrity Section will monitor implementation of this waiver. Monitoring of the waiver may be conducted through a variety of approaches that may include routine desk reviews and on-site compliance monitoring to ensure the state is complying with all applicable regulations and requirements.

The WDD State Reporting Section will coordinate with appropriate data and case management staff to ensure in-school data is accurately captured and reported in Youth WIOA performance measures.

At the end of each program year after the waiver allowance is implemented, the WDD State Reporting Section will evaluate impacts, if any, the availability of in-school youth ITAs have had on the state's workforce development system and report this data to the Alabama State Workforce Development Board.

Opportunity for Local Board and Public Comment on the Waiver Request

Workforce development stakeholders, including local boards, businesses, and organized labor organizations, will be notified of the State of Alabama's proposed Four-Year Combined State Plan including this waiver request through an e-mail alert. The e-mail alert will contain instructions on how to submit comments. In addition, both the general public and stakeholders will have access to the waiver request on the Alabama WIOA website: <https://wioa-alabama.org>. The public comment period will be open for two months.

STATE RESPONSE ONLY FOR THIS WAIVER REQUEST

Requested Waiver: Waiver of the Requirement for Eligible Training Providers to Collect Performance Data for All Students in a Training Program

Statutory and/or regulatory requirements to be waived

Alabama requests the consideration of a waiver from the requirements in WIOA, Sections 116 (related to performance) and 122 (related to the Eligible Training Provider List), and at 20 Code of Federal Regulations (CFR) 677.230 and 20 CFR 680.400-680.530. In whole these regulations constitute a burdensome requirement for the collection and reporting of performance outcomes

for all students, above and beyond WIOA participant students, participating in training programs listed on Alabama's Eligible Training Provider List (ETPL).

Many training providers do not have existing staff to perform the data gathering processes required to submit program information and performance data and cannot justify hiring additional staff. The regulations and related performance measures requiring providers to include an "all students" cohort also interferes with The Federal Educational Rights and Privacy Act of 1974 (FERPA) laws. These issues are leading to Alabama having a less than robust list of training providers. Alabama currently has 711 programs on its ETPL compared to the 1,366 programs it had in PY 2014 before the implementation of WIOA and these regulations.

Alabama will continue to consider all student data when making a determination of eligibility of a provider and programs as made available to the public by training providers. However, it will only report on WIOA participants who receive training from an ETP in line with this waiver.

Alabama will also review requirements for eligibility determination each year. Reporting requirements will be altered each year incrementally over a time period of four years until the level of collection and reporting is in line with the requirements contained in Training and Employment Guidance Letter (TEGL) 8-19.

State or Local Statutory Barriers

There is no State or local statutory or regulatory barrier to implementing the proposed waiver.

Strategic Goals of the Waiver and Expected Programmatic Outcomes

Strategic goals and expected programmatic outcomes include:

- Removal of the most significant disincentive for schools and training providers to participate in the ETPL, in anticipation of maximizing the available marketplace of training curriculum.
- More numerous and varied training offerings for individuals utilizing Individual Training Accounts (ITAs) via the public workforce system.
- More training providers may lead to lower cost and more robust demand-driven training options.
- Greater utilization of the ETPL by individuals pursuing training in Alabama related to jobs that are in-demand by employers now and in the future. Enabling Alabama to provide training at the speed of business development.
- Stronger partnerships and relationships between training providers and the public workforce system.

- Enhanced ability of staff at local Alabama Career Centers to more effectively respond in meeting the needs of job seekers and employers alike.

Alignment with USDOL/ETA Policy Priorities

This waiver aligns with USDOL/ETA policy priorities such as:

- Efficiently and effectively connecting the current network of education and training strategies with an existing proven system of accountability;
- Improving job and career results by increasing the ability of new and established providers to meet reporting accountability standards; and
- Creating efficiencies by eliminating burdensome reporting requirements.

Description of Individuals, Groups, or Populations Impacted by the Waiver

Alabama citizens in need of additional training to obtain employment, the Alabama Department of Commerce/Workforce Development Division ETPL staff, the Alabama Career Center System and staff, subcontracted service providers, and especially the training provider staff will benefit from this waiver.

Description of the Process to Monitor the Waiver Program and Collect Waiver Outcome Information

The State of Alabama will monitor progress and ensure accountability for Federal funds in connection with these waivers by reviewing monthly expenditure, performance and other reports, through regular contact with the ETA Regional Office liaisons, and through its monitoring and performance accountability system.

Opportunity for Local Board and Public Comment on the Waiver Request

Workforce development stakeholders, including local boards, businesses, and organized labor organizations, will be notified of the State of Alabama's proposed Four-Year Combined State Plan including this waiver request through an e-mail alert. The e-mail alert will contain instructions on how to submit comments. In addition, both the general public and stakeholders will have access to the waiver request on the Alabama WIOA website: <https://wioa-alabama.org>. The public comment period will be open for two months.

Requested Waiver: Waivers associated with the requirement at WIOA Section 129(a)(4)(A) and 20 CFR 681.410 that states and local areas expend 75% of all Governor's reserve and local formula youth funds on out-of-school youth (OSY).

Statutory and/or regulatory requirements to be waived

WIOA Section 129(a) (4) and 20 CFR 681.410

1. A waiver of the requirement to expend 75% of funding on the OSY population. Alabama is requesting that this percentage be lowered to 50%.
2. A waiver of the requirement that local funding must meet the 75% minimum expenditure requirement. Alabama is requesting that this percentage be lowered to 50%.
3. A waiver of the requirement to expend 75% of Statewide activities funding on the OSY population. Alabama is requesting that this percentage be lowered to 50%.

The State of Alabama has been able to meet the required 75% expenditure rate for out-of-school youth since WIOA began. However, we are requesting to lower the out-of-school expenditure rate for out-of-school youth for the state as a whole, local areas, and statewide activities to 50% because the State sees the need to serve more in-school youth by partnering with programs for at-risk in-school youth such as Jobs for America's Graduates (JAG). By investing additional funds for in-school youth at risk of dropping out of school, the State expects to lower the number of out-of-school youth who dropped out of school.

The State of Alabama will continue to serve out-of-school youth by providing occupational skills training, work based learning, tutoring/study skills, education and workforce preparation activities, leadership development opportunities, supportive services, mentoring, guidance and counseling, financial literacy, entrepreneurial skills training, career counseling, transition to postsecondary education activities, and follow up services. The State of Alabama will also work with combined state plan partners to ensure out-of-school youth have access to all the services they need using a no wrong door approach. By partnering with other agencies to serve out-of-school youth, the impact of reduced funding will be lessened, and the needs of this population will continue to be met.

State or Local Statutory Barriers

There is no State or local statutory or regulatory barrier to implementing the proposed waiver.

Alignment with USDOL/ETA Policy Priorities

The WIOA encourages strategies that connect education and training as well as supporting work-based learning and improving job and career results. This waiver request will increase the connection between education and training and training, provide work-based learning

opportunities that include work experience and pre-apprenticeship, and increase access to workforce services for disadvantaged youth.

Strategic Goals of the Waiver and Expected Programmatic Outcomes

1. Align Youth Services with the strategic plan. An additional 200? in-school youth will be served each year as a result of this waiver.
2. The state better spends federal resources with more flexibility
3. The decreased dropout rate will result in a shrinking pool of potential Out of School Youth by 10% of the number of dropouts during 2019.
4. Improved fiscal accountability relative to providers of services

Description of Individuals, Groups, or Populations Impacted by the Waiver

- Future Employers,
- Alabama In School and Out of School Youth populations;
- Parents;
- Out of School Youth providers; and In-School Youth Providers;
- Alabama Career Center (One-Stop) System

Description of the Process to Monitor the Waiver Program and Collect Waiver Outcome Information

Annual WIOA on-site programmatic reviews will include an evaluation of how local waivers are being utilized and the success of achieving goals and outcomes. Youth service providers will also be responsible for assessing the use and effectiveness of waivers.


Opportunity for Local Board and Public Comment on the Waiver Request

Workforce development stakeholders, including local boards, businesses, and organized labor organizations, will be notified of the State of Alabama's proposed Four-Year Combined State Plan including this waiver request through an e-mail alert. The e-mail alert will contain instructions on how to submit comments. In addition, both the general public and stakeholders will have access to the waiver request on the Alabama WIOA website: <https://wioa-alabama.org>. The public comment period will be open for two months.

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION WIOA Performance
	CORRESPONDENCE SYMBOL OWI/OPDR
	DATE November 7, 2018

ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 5-18

TO: STATE AND LOCAL STAKEHOLDERS IN THE WORKFORCE
INNOVATION AND OPPORTUNITY ACT
STATE WORKFORCE AGENCIES

FROM: MOLLY E. CONWAY 
Acting Assistant Secretary

SUBJECT: Workforce Innovation and Opportunity Act (WIOA) Annual Statewide
Performance Report Narrative

1. **Purpose.** To provide guidance to WIOA state grantees regarding the content of the WIOA Annual Statewide Performance Report Narrative for titles I and III and the procedures for submission to the Employment and Training Administration (ETA). The report is due annually on December 1, or the first business day thereafter should that date fall on a weekend. The PY 2017 report is due December 3, 2018.
2. **Action Requested.** WIOA Title I and III grantees are to submit the annual report narrative in accordance with this guidance. Recipients should distribute this TEGL to those personnel responsible for developing the WIOA Annual Statewide Performance Report Narrative, including personnel responsible for performance reporting.
3. **Summary and Background.**
 - a. **Summary** – This guidance details when and how states submit WIOA Annual Statewide Performance Report Narratives and the content ETA requests in these narratives.
 - b. **Background** – Each state that receives an allotment under WIOA section 127 (Youth), or section 132 (Adult and Dislocated Worker) (for the purposes of this guidance the programs within these two sections will be referred to as title I), or sections 301-308 (title III Wagner Peyser Employment Service) must prepare and submit a WIOA Annual Statewide Performance Report Narrative of performance progress to the Secretary of Labor in accordance with the “WIOA Common Performance Reporting - OMB Control No. 1205-0526.” The WIOA Annual Statewide Performance Report

RESCISSIONS TEGL 06-13, TEGL 09-14	EXPIRATION DATE Continuing
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Narrative serves as a complement to the WIOA Annual Statewide Performance Report (ETA 9169) requirements defined in OMB Control No. 1205-0526 and in Training and Employment Guidance Letter (TEGL) 10-16, Change 1.

States were previously required to submit annual report narratives under the Workforce Investment Act of 1998 (WIA) through PY 2015, but were not required to submit an Annual Statewide Performance Report Narrative for PY 2016 as they transitioned to the new performance reporting requirements under WIOA.

4. **WIOA Annual Statewide Performance Report Narrative Contents.** For titles I and III core programs, states must submit an Annual Report Narrative, which must be limited to no more than 25 pages. States are permitted (but not required) to include appendices, such as relevant data tables or state/local area reports, which are not subject to the 25-page limit. The WIOA Common Performance Reporting (OMB Control No. 1205-0526) joint information collection request requires that other core partner programs (WIOA title II Adult Education and Family Literacy Act and WIOA title IV Vocational Rehabilitation) assist in the development of the report narrative as appropriate, but these other core programs are not required to submit the narrative described in this guidance.

The WIOA Annual Statewide Performance Report Narrative provides an opportunity for states to describe progress towards meeting their strategic vision and goals for the workforce system. States are not limited to the requested items below and may include additional information about their programs. States have flexibility regarding the contents of the Annual Report Narrative, as long as they address the requested items and stay within the 25-page limit.

In their narratives, states should include the following requested items:

- Identify each waiver that the state has had in place for at least one program year and provide information regarding the state's progress toward achieving the goals and performance outcomes in ETA's letter of approval for the waiver (sec 189(i)(3)(C)(ii)) and outlined in the state's waiver request (when applicable). Discuss how activities carried out under each approved waiver have directly or indirectly affected state and local area performance outcomes. To the extent possible, provide quantitative information.
- Identify the two approaches the state has chosen for the Effectiveness in Serving Employers performance indicator pilot. If the state is piloting a state-established measure of Effectiveness in Serving Employers, or has any other metrics to assess employer engagement, describe the measure or metric as well.
- Include brief descriptions of: (a) current or planned evaluation and related research projects, including methodologies used; (b) efforts to coordinate the development of such projects with WIOA core programs, other state agencies and local boards; (c) a list of completed evaluation and related reports and links to where they were made accessible to the public electronically; (d) State efforts to provide data, survey responses, and timely

site visits for Federal evaluations; and (e) any continuous improvement strategies utilizing results from studies and evidence-based practices evaluated.

- Describe the state's approach to customer satisfaction, which may include such information used for one-stop center certification, in accordance with 20 CFR 678.800. This description should include: 1) the state's methodologies; 2) the number of individuals/employers who were provided customer satisfaction outreach, the response rate, and efforts made to improve the response rate; 3) the results and whether the results are generalizable to the entire population of customers; and 4) a description of any continuous improvement processes for incorporating the customer satisfaction feedback.

In the report, states should consider providing information on:

- Progress made in achieving the state's strategic vision and goals, as described in the state's Unified or Combined State Plan, for developing its workforce and meeting employer needs in order to support economic growth and economic self-sufficiency.
- Progress made in implementing sector strategies and career pathways. The discussion may include: business engagement strategies, work-based learning (including apprenticeship), work experiences for youth and adults, transitional jobs, and incumbent worker training strategies and policies in the state.
- If the state has received a small state minimum allotment exception to decrease the minimum out-of-school youth expenditure requirement, describe how the exception has impacted services provided to both in-school youth and out-of-school youth, including specific strategies for serving each population, as well as how the state and/or local area is ensuring serving out-of-school youth remains a priority.
- The state's performance accountability system, including:
 - Any specific state performance measures or goals and progress towards meeting them.
 - Any performance deficiencies on the primary indicators of performance, which may include descriptions of any factors impacting performance.
 - The state's common exit policy, including which ETA-funded partner programs are included in the state's common exit policy.¹
 - Negotiated performance levels for local areas for titles I and III core programs for program years 2016-2017.

¹ Common exit occurs when a participant, enrolled in multiple partner programs, has not received services from *any* DOL-administered program in which the participant is enrolled, to which the common exit policy applies, for at least 90 days, and no future services are planned.

- The state's approach to data validation and ensuring data integrity, including a description of the methodology of any validation activities that occurred.
- Activities provided by state funds:
 - Activities provided with the funds reserved by the governor, which can be up to 15% of the state's allotment.² In this section of the narrative, states may describe activities undertaken in whole or in part with their Governor's Reserve and how those activities have directly or indirectly impacted performance.
 - Rapid response activities and layoff aversion, which may include:
 - Data on number of companies served and number of individuals served.
 - Discussion of strategies for linking Rapid Response recipients to American Job Centers and processes for intake or co-enrollment in the Trade Adjustment Assistance and the Dislocated Worker programs.
 - Discussion of layoff aversion strategies, including any metrics/outcomes developed and/or tracked by the state with respect to layoff aversion, such as return on investment or measures showing the economic benefits of Rapid Response and layoff aversion.
 - Discussion of how Rapid Response and layoff aversion activities are aligned with business engagement, sector strategy, and career pathway efforts, which may include a discussion of any systems, tools, networks or approaches designed to identify companies in distress and strategies to deliver necessary solutions as early as possible, as well as outcomes of the use of such systems or tools.
 - Discussion of specific types of services or workshops provided to both companies and affected workers.
 - Activities provided under the Wagner-Peyser Act Employment Service section 7(b) (e.g., services to groups with special needs or extra costs of exemplary models for delivering services).
- Any National Dislocated Worker Grants (DWGs) awarded to or within the state and how those funds are coordinated with state rapid response activities and dislocated worker programs, as well as how the DWGs fit in with state co-enrollment policies and disaster/emergency management activities, as applicable.
- Any technical assistance needs of the state workforce system.

² See WIOA section 128(a)(1).

- Promising practices, lessons learned, and success stories that focus on serving employers, communities, and individuals with barriers to employment, including information based on the state's evaluation and related research projects. This discussion should cover a broad range of at-risk and priority populations served, including out-of-school youth, low-income adults, dislocated workers, individuals who are basic skills deficient, individuals with limited language proficiency, individuals with disabilities, veterans, the long-term unemployed, and any other individuals with barriers to employment, or other populations the state may wish to discuss.
 - Any challenges the state workforce system faces, which may include policy, implementation, or other relevant challenge.
 - Any strategies/policies relating to Pay-for-Performance contracting, which may include examples from local areas.
5. **Due Date:** The Annual Statewide Performance Report Narrative for PY 2017 is due on December 3, 2018, and will reflect information about activities and outcomes taking place for PY 2017, which is July 1, 2017, through June 30, 2018. Subsequent Report Narratives are due by the close of business on December 1 for the program year ending June 30 of the same year, or the first business day thereafter should December 1 fall on a weekend.³
 6. **Submission:** An electronic copy of the WIOA Annual Statewide Performance Report Narrative must be e-mailed to WIOA.AR@dol.gov by the close of business on December 3, 2018, for the PY 2017 submission, with a courtesy copy e-mailed to the state's respective ETA Regional Administrator and Federal Project Officer. Hard copies of the report may be submitted but are not required. ETA will publish each state's report at <https://www.doleta.gov/performance>. ETA will only accept 508-compliant PDF formats, which means that WIOA Annual Statewide Performance Report Narratives must be submitted electronically in a machine-readable format to comply with requirements set forth in Section 508 of the Rehabilitation Act, since each state's report will be posted on ETA's Performance web site.
 7. **Inquiries.** Please direct questions concerning this TEGL to your appropriate DOL ETA Regional Office.
 8. **References.** See Attachment I.
 9. **Attachment(s).**
Attachment I – References

³ Please note, as identified in previous guidance (TEGL 03-17, WIOA Annual Performance Report Submission), the WIOA Annual Statewide Performance Report (ETA-9169) is due not later than October 1 each year.

References

- Workforce Innovation and Opportunity Act, Pub. L. 113-128
- Joint Rule for Unified and Combined State Plans, Performance Accountability, and the One-Stop System Joint Provisions; Final Rule (WIOA Joint Final Rule) published at 81 FR 55792 (Aug. 19, 2016)
- Employment and Training Administration, Workforce Innovation and Opportunity Act; Final Rule (WIOA DOL Final Rule) published at 81 FR 56071 (Aug. 19, 2016)
- DOLETA Performance Reporting page: <https://doleta.gov/performance/reporting/>
- DOLETA State Plan Resources page: https://doleta.gov/wioa/State_Plan_Resources.cfm
- *Required Elements for Submission of the Unified or Combined State Plan and Plan Modifications under the Workforce Innovation and Opportunity Act*, (OMB Control No. 1205-0522), <https://doleta.gov/wioa/docs/December17-ICR-State-Plan-Modification.pdf>
- Workforce Innovation and Opportunity Act (WIOA) Common Performance Reporting - OMB Control No. 1205-0526
- Training and Employment Guidance Letter (TEGL) 10-16, Change 1, *Performance Accountability Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III and Title IV Core Programs* (August 23, 2017)
- TEGL 03-17, *WIOA Annual Performance Report Submission* (September 12, 2017)