

**ALABAMA WORKFORCE DEVELOPMENT SYSTEM**  
**Workforce Development Division**  
**401 Adams Avenue**  
**PO Box 304103**  
**Montgomery, Alabama**

**ADMINISTRATIVE DIRECTIVE PY2025-02**

**SUBJECT:** Local Area Program Year 2024 WIOA Annual Report

**Purpose:** To provide Local Areas guidance for the Program Year 2024 Annual Report.

**Effective Date:** July 8, 2025

**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. To assist the State in the preparation of the Report, each local area (region) 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) 05-18, Change 1 issued on July 8, 2025 to prepare the annual report. The Narrative Annual Report from the State must be submitted to USDOL, ETA no later than December 1, 2025. To accommodate this requirement and allow time for review of local area reports, Local Workforce Development Area (LWDA) annual reports must be submitted to the Workforce Development Division by October 15, 2025.

Guidance regarding Local Area PY 2024 Annual Report content is attached.

**Action:** Each Alabama Local Workforce Development Area shall submit to the Alabama Department of Workforce, Attention: Paul Sullivan, paul.sullivan@commerce.alabama.gov an annual report of WIOA Adult, Dislocated Worker, and Youth program activities conducted during Program Year 2024 , July 1, 2024 through June 30, 2025.

With the issuance of this Administrative Directive, Governor's Workforce Innovation Directive PY2022-03 is rescinded.

**Contact:** Questions regarding WIOA Annual Reports should be directed to Lorilei Sanders, Alabama Department of Workforce at (334) 353-1632 or lorilei.sanders@commerce.alabama.gov.

*Tammy Wilkinson*

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**Tammy Wilkinson, Division Director**  
**Workforce Development Division**

**Attachments:** Local Area PY24 WIOA Annual Report Content Guidance  
TEGL No. 5-18, Change 1  
State of Alabama PY24 – PY25 Waiver

## Local Area PY24 WIOA Annual Report Content Guidance

- a. A discussion about the following State of Alabama's Waiver:
  - 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. This waiver was approved as part of the current State Combined Plan. Please include information and discussion on the following:
    1. Discuss how activities carried out under the approved waiver have made progress toward achieving the goals and performance outcomes as stated under the **Goals of the Waiver and Expected Programmatic Outcomes** listed in the attached **State of Alabama PY24 – PY25 Waiver Request**.
- 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. The description should include:
  1. The local area's methodologies;
  2. The number of individuals/employers who were provided customer satisfaction outreach, the response rate, and efforts 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.
- 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 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. Efforts to increase access to Registered Apprenticeship Programs (RAPs) including the creation of new RAPs and expansion of existing RAPs such as youth apprenticeship opportunities.
- 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 2024 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 and any technical assistance needed.

Note that other information may be requested, if directed by USDOL.

<b>EMPLOYMENT AND TRAINING ADMINISTRATION</b> <b>ADVISORY SYSTEM</b> <b>U.S. DEPARTMENT OF LABOR</b> <b>Washington, D.C. 20210</b>	<b>CLASSIFICATION</b> WIOA Performance
	<b>CORRESPONDENCE SYMBOL</b> OWI/OPDR
	<b>DATE</b> July 8, 2025

**ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 05-18,**  
**Change 1**

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

**FROM:** LORI FRAZIER BEARDEN   
Acting Assistant Secretary

**SUBJECT:** Workforce Innovation and Opportunity Act Annual Statewide Performance  
Report Narrative

1. **Purpose.** To provide guidance to Workforce Innovation and Opportunity Act (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 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.

The change in the ETA guidance aligns the Annual Statewide Performance Narrative requirements with [Workforce Innovation and Opportunity Act Effectiveness in Serving Employers Performance Indicator](#) final rule (89 FR 13814 (Feb. 23, 2024)) (Final Rule) and provides a suggested narrative reporting format for state submissions. Grantees are encouraged to leverage this report to serve legislatures, and other state workforce system stakeholders as appropriate.

2. **Action Requested.** In compliance with 20 CFR 677 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>RESCISSIONS</b> TEGL 05-18	<b>EXPIRATION DATE</b> Continuing
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- 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 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) No. 10-16, Change 3, [\*Performance Accountability Guidance for Workforce Innovation and Opportunity Act \(WIOA\) Core Programs\*](#) issued June 11, 2024.

An electronic copy of the WIOA Annual Statewide Performance Report Narrative must be emailed to [WIOA.AR@dol.gov](mailto:WIOA.AR@dol.gov) by the close of business on December 1<sup>st</sup> (or the first business day thereafter should December 1 fall on a weekend) with a courtesy copy emailed to the state's respective ETA Regional Administrator and Federal Project Officer.

#### **4. WIOA Annual Statewide Performance Report Narrative Format and Content.**

The WIOA Annual Statewide Performance Report Narrative provides an opportunity for states to describe progress towards meeting their strategic vision and goals including those described in their current WIOA Unified or Combined Strategic Plan.

##### **a. Format.**

- i. 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.
- ii. Attachment I includes a suggested report narrative format. States are encouraged to incorporate a table of contents, subject headers in the order of the requested inputs outlined in this guidance, and numbered pages. Tables and Graphics are encouraged. However, state submissions must be 508 compliant 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 website.

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.

**b. Content.** In their narratives, states should include the following requested items:

- i. Waivers. 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 intended results, 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 positively or negatively and direct or indirect affected state and local area performance outcomes.
- ii. Evaluations. Include brief descriptions of current or planned evaluation and related research projects, including the following:
  1. Methodologies used;
  2. Efforts to coordinate the development of such projects with WIOA core programs, other state agencies and local boards;
  3. A list of completed evaluation and related reports and links to where they were made accessible to the public electronically;
  4. State efforts to provide data, survey responses, and timely site visits for Federal evaluations;
  5. Any continuous improvement strategies utilizing results from studies and evidence-based practices evaluated; and
  6. Include planned timelines for completion and publication of evaluations as applicable.
- iii. Customer Satisfaction. Describe the state's approach to customer satisfaction, which may include such information used for 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.
- iv. State Strategies. In the report, states should provide information in the following areas:
  1. 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 to support economic growth and economic self-sufficiency;
  2. Progress made in implementing sector strategies and career pathways, business engagement strategies, work-based learning, work

- experiences for youth and adults, transitional jobs, on-the-job training, and incumbent worker training strategies and policies in the state;
3. Efforts to increase access to Registered Apprenticeship Programs (RAPs) including creation of new RAPs and expansion of existing RAPs such as new youth apprenticeship opportunities.
- v. Performance Accountability. The state's performance accountability system, including:
1. Specific state performance measures or goals and progress towards meeting them;
  2. Any performance deficiencies on the primary indicators of performance, which may include descriptions of any factors impacting performance;
  3. The state's common exit policy, as applicable, including which ETA-funded partner programs are included;
  4. Negotiated performance levels for local areas for Title I core programs; and
  5. The state's approach to data validation and ensuring data integrity, including a description of the methodology of any validation activities.
- vi. Statewide Governor's Reserve Funds. Activities funded by statewide Governor's Reserve funds:
1. Activities provided with the funds reserved by the governor, which can be up to 15% <sup>1</sup> of the state's allotment. Describe activities undertaken in whole or in part with the Governor's Reserve and how those activities have directly or indirectly impacted performance;
  2. States may include descriptions of state funded activities or investments in this section.
- vii. Rapid Response. Rapid response activities and layoff aversion, which may include:
1. Data on number of companies served and number of individuals served;
  2. Strategies for linking Rapid Response recipients to American Job Centers and processes for intake or co-enrollment in core and partner programs. Details of specific types of services provided to both companies and affected workers; and
  3. 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 and how layoff aversion activities are aligned with business engagement, sector strategy, and career pathway efforts. States may detail systems, tools, networks or approaches designed to identify companies in distress and

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<sup>1</sup> See WIOA section 128(a)(l).

strategies to deliver necessary solutions as early as possible, as well as outcomes of the use of such systems or tools.

- viii. Wagner-Peyser Act Activities. Activities provided under the Wagner-Peyser Act Employment Service section 7(a) and 7(b) including activities such as providing job search and placement to Unemployment Insurance claimants, administering the work test and making eligibility assessments (e.g. Reemployment Services Eligibility Assessment).
- ix. National Dislocated Worker Grants (NDWGs). NDWGs 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 NDWGs fit in with state co-enrollment policies and disaster/emergency management activities, as applicable.
- x. State Best Practices and Needs. This section may address:
  - 1. Challenges the state workforce system faces, which may include policy, implementation, reporting, data analysis, or other relevant challenges, and any assistance needs of the state to address those challenges;
  - 2. 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 individuals with a barrier to employment as defined in WIOA Section 3(24)<sup>2</sup>, Registered Apprenticeships, or other populations the State may wish to discuss; and
  - 3. Strategies/policies relating to Pay-for-Performance contracting, which may include examples from local areas.

**5. Inquiries.** Please direct inquiries to the appropriate Regional Office.

**6. References.**

- Workforce Innovation and Opportunity Act, Pub. L. 113-128;

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<sup>2</sup> Individual with a Barrier to Employment: (A) Displaced homemakers. (B) Low-income individuals. (C) Indians, Alaska Natives, and Native Hawaiians, as such terms are defined in section 166. (D) Individuals with disabilities, including youth who are individuals with disabilities. (E) Older individuals. (F) Ex-offenders. (G) Homeless individuals (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6))), or homeless children and youths (as defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))). (H) Youth who are in or have aged out of the foster care system. (I) Individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers. (J) Eligible migrant and seasonal farmworkers, as defined in section 167(i). (K) Individuals within 2 years of exhausting lifetime eligibility under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.). (L) Single parents (including single pregnant women). (M) Long-term unemployed individuals. (N) Such other groups as the Governor involved determines to have barriers to employment.



- 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 \(Aug. 19, 2016\)](#);
- Workforce Innovation and Opportunity Act [Effectiveness in Serving Employers Performance Indicator final rule](#) (89 FR 13814 (Feb. 23, 2024)) (Final Rule)
- Workforce Innovation and Opportunity Act (WIOA) Common Performance Reporting, Annual Statewide Performance Report Narrative, Information Collection Request (ICR) [OMB Control No. 1205-0526](#)
- DOLETA Performance Reporting page: [Reporting Requirements | U.S. Department of Labor](#);
- DOLETA State Plan Resources page: <https://www.dol.gov/agencies/eta/wioa/resources>;
- 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); and
- [Training and Employment Guidance Letter \(TEGL\) 10-16, Change 3, Performance Accountability Guidance for Workforce Innovation and Opportunity Act \(WIOA\) Core Programs](#) (June 11, 2024).

7. **Attachment(s).**

- Attachment I—Suggested WIOA Annual Statewide Performance Report Narrative format.

## **Suggested WIOA Annual Statewide Performance Report Narrative Format**

The following outline provides a suggested formatting structure for the WIOA Annual Statewide Performance Report Narrative. The optional format includes a table of contents, and topic headers in the order of the guidance to ease review. Limit the body of the narrative to 25 numbered pages. States are encouraged to include 508 compliant tables, charts, and graphics. Attachments are permitted and not included in the 25-page limit.

The Annual Statewide Performance Report Narrative should contain a title page which includes the state name, report title, and date, and a table of contents; inclusion of a linked table of contents aids readers in navigating the state's report. States may also include an introductory letter (optional) from agency or state leadership to introduce the report and highlight specific areas of interest.

### **Waivers**

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 intended results, 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.

### **Evaluations**

Include brief descriptions of current or planned evaluation and related research projects, including the following:

- Methodologies used;
- Efforts to coordinate the development of such projects with WIOA core programs, other state agencies and local boards;
- A list of completed evaluation and related reports and links to where they were made accessible to the public electronically;
- State efforts to provide data, survey responses, and timely site visits for Federal evaluations;
- Any continuous improvement strategies utilizing results from studies and evidence-based practices evaluated; and
- Include planned timelines for completion and publication of evaluations as applicable.

### **Customer Satisfaction**

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:

- The state's methodologies;

- The number of individuals/employers who were provided customer satisfaction outreach, the response rate, and efforts made to improve the response rate;
- The results and whether the results are generalizable to the entire population of customers; and
- A description of any continuous improvement processes for incorporating the customer satisfaction feedback.

## State Strategies

In the report, states should consider providing information in the following areas:

- 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 to support economic growth and economic self-sufficiency.
- Progress made in implementing sector strategies and career pathways such as business engagement strategies, work experiences for youth and adults, transitional jobs, and incumbent worker training strategies and policies in the state.
- Efforts to increase access to Registered Apprenticeship Programs (RAP) including creation of new RAPs and expansion of existing RAPs such as new youth apprenticeship opportunities.

## Performance Accountability

The state's performance accountability system, including:

- 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, as applicable, including which ETA-funded partner programs are included.
- Negotiated performance levels for local areas for Title I core programs. A suggested table format is below which may be included as an attachment.

Table: Example Negotiated Local Area Performance Levels and Results (e.g. PY 2024)

PY 2024 Local Board Code	Measure	PY 2024 Negotiated Target	PY 2024 Actual Result	PY 2025 (Next PY) Negotiated Target

- The state's approach to data validation and ensuring data integrity, including a description of the methodology of any validation activities

## Statewide Governor's Reserve Funds

Activities provided with the funds reserved by the governor, which can be up to 15% <sup>3</sup> of the state's allotment.

- Describe activities undertaken in whole or in part with the Governor's Reserve and how those activities have directly or indirectly impacted performance.
- States may include descriptions of state funded activities or investments in this section.

## Rapid Response

Rapid response activities and layoff aversion, which may include:

- Data on number of companies served and number of individuals served.
- Strategies for linking Rapid Response recipients to American Job Centers and processes for intake or co-enrollment in core and partner programs. Details of specific types of services provided to both companies and affected workers.
- 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 and how layoff aversion activities are aligned with business engagement, sector strategy, and career pathway efforts. States may detail 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.

## Wagner-Peyser Activities

Activities provided under the Wagner-Peyser Act Employment Service section 7(a) and 7(b) including activities such as providing job search and placement to Unemployment Insurance claimants, administering the work test and making eligibility assessments (e.g. Reemployment Services Eligibility Assessment).

## National Dislocated Worker Grants (NDWGs)

NDWGs 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 NDWGs fit in with state co-enrollment policies and disaster/emergency management activities, as applicable.

## State Best Practices and Needs

This section may address:

1. Challenges the state workforce system faces, which may include policy, implementation, reporting, data analysis, or other relevant challenges, and any assistance needs of the state to address those challenges.
2. Promising practices, lessons learned, and success stories that focus on serving employers, communities, and individuals with barriers to employment, including

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<sup>3</sup> See WIOA section 128(a)(I).

information based on the state's evaluation and related research projects. This discussion should cover individuals with a barrier to employment as defined in WIOA Section 3(24)<sup>4</sup>, Registered Apprenticeships, or other populations the State may wish to discuss.

3. Strategies/policies relating to Pay-for-Performance contracting, which may include examples from local areas.

## Attachments

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<sup>4</sup> Individual with a Barrier to Employment: (A) Displaced homemakers. (B) Low-income individuals. (C) Indians, Alaska Natives, and Native Hawaiians, as such terms are defined in section 166. (D) Individuals with disabilities, including youth who are individuals with disabilities. (E) Older individuals. (F) Ex-offenders. (G) Homeless individuals (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2(6))), or homeless children and youths (as defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))). (H) Youth who are in or have aged out of the foster care system. (I) Individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers. (J) Eligible migrant and seasonal farmworkers, as defined in section 167(i). (K) Individuals within 2 years of exhausting lifetime eligibility under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.). (L) Single parents (including single pregnant women). (M) Long-term unemployed individuals. (N) Such other groups as the Governor involved determines to have barriers to employment.

## PY24 – PY25 Youth ITA Waiver

### 1. 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 to ITAs to in-school youth. Instead, in-school youth wishing to access ITAs may only do so through the WIOA adult program, if eligible as an adult. 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 16-21 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, specially creating career pathways for in-school youth.

The State of Alabama is requesting a renewal of this waiver. Approximately 54 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. Alabama plans to provide technical assistance to Local Workforce Development Areas (LWDAs) during the upcoming year on how to make the best use of this waiver.

### 2. State or Local Statutory Barriers.

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

### 3. 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 40 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. 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 55% of in-school youth enrolled in ITAs will obtain an MSG. The State also expects Placed in Employment/Education Second Quarter, Placed in Employment/Education Fourth Quarter, and Median Earnings Second Quarter 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.

#### 4. Alignment with USDOL/ETA Policy Priorities.

In the WIOA, 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 16-21, 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. Alabama has at least 2 job openings for every working age individual and needs to find workers to fill those jobs.

#### 5. Description of Individuals, Groups, or Populations Impacted by the Waiver

WIOA in-school youth participants, ages 16-21 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 16-21 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.

#### 6. 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 and posted to our website, [www.WIOA-alabama.org](http://www.WIOA-alabama.org), to announce the revised policy and other information important to convey regarding the waiver allowance. WDD have established cost categories to reflect training attended by in-school youth, and project numbers assigned to these categories have been 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) utilize a unified case and data management system to track and report youth participant activities. 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.

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 16 - 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 AlabamaWorks case management system including ITA-related training, supportive services, follow-up, and outcomes.

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.

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:[www.wioa-alabama.org](http://www.wioa-alabama.org).

(7) 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.