

ATTACHMENT H3

The District of Columbia Waiver Request Workforce Investment Act Extension of Initial Eligibility of Training Providers

The Department of Employment Services (DOES), which has been designated by the Mayor of the District of Columbia as the administrative entity for the Workforce Investment Act (WIA), and the District of Columbia Workforce Investment Council (DCWIC), are requesting a general waiver that will extend the period of initial eligibility of training providers which addresses the Eligible Training Provider List (ETPL) requirement for subsequent eligibility determinations. The proposed waiver will contribute towards increased performance outcomes for training services and will allow the District to enhance systems that facilitate the provision of informed training choices for all District customers based on the availability of up to date and thorough performance data on providers of training services.

The granting of this waiver will support the District's ability to cultivate a demand driven workforce by promoting informed customer choice capabilities. The District recognizes the importance of enhancing and sustaining service impact and is committed to aligning efforts that actualize the national strategic direction of increased accountability by enhancing meaningful service outcomes that lead to customer self-sufficiency.

As a single service entity, the District of Columbia's structure for WIA consists of the Department of Employment Services (DOES), which is responsible for providing the administrative and fiscal management systems for program implementation, and the District of Columbia's Workforce Investment Council (DCWIC), which performs policy functions and represents the Mayor's economic development priorities. The planning and delivery of services are performed through the DOES Associate Director of One-Stop Career Center Operations.

This waiver request follows guidelines identified in WIA Section 189(i)(4)(B) (29 USCA Section 2939(i)(4)(B)) and WIA Final Regulations at 20 CFR Section 661.420(c).

1. Statutory Regulations to be Waived:

WIA Section 122(c)(5) and Title 20 CFR Part 663.530 requires time limit observance for initial eligibility of providers of training services before being considered for subsequent eligibility for inclusion on the State List of Eligible Training Providers.

The District of Columbia is requesting that it be allowed to waive the federal time limit and extend initial eligibility for training providers from eighteen (18) months to twenty-four (24) months before fully implementing the subsequent eligibility determination process.

2. State or Local Statutory Regulatory Barriers:

There are no state statutory or regulatory barriers to impede the proposed waiver and DOES policies and the DCWIC are in compliance with the current Federal guidelines. Upon notification of approval, if this waiver request is granted, DOES policy will be amended to comply with the terms of the waiver.

3. Goals to be Achieved by the Waiver:

The goal to be achieved by the granting of the waiver is to increase the quality and quantity of demand driven training options for job seekers and to insure that District residents are informed consumers of training services that are most likely to successfully prepare them for the pursuit and obtainment of self-sufficient careers.

The District is committed to the collection and accessible dissemination of relevant performance information that upholds the spirit and intent of the WIA principles of consumer choice and improved program accountability. Increasing the quality, quantity, and accessibility of performance information to training providers will ultimately provide baseline benchmarks of service expectations by establishing a performance outcome matrix that will provide a more defined, and much less arbitrary, criteria set for subsequent eligibility determinations for training providers.

The District has already begun efforts to collect, organize and reflect comprehensive performance information required for training providers to remain on the State Eligibility List annually without being overly burdensome to training providers. Currently the District's automated workforce investment delivery system, Virtual One Stop (DCVOS) houses a Consumer Reports System (CRS) that delivers training provider information and will be implementing an individual tracking fund (ITF) that will combine with information obtained from unemployment insurance records and the New Hire Directory. The combining of informational systems will establish an expanded performance matrix platform that will comprehensively guide subsequent eligibility determinations.

All WIA requirements for initial and subsequent eligibility determinations will continue to be upheld. The DCWIC will insure compliance by, at a minimum, continuing to review Completions and Credentials (self-attestations) of the Individual Training Accounts (ITA) training providers.

4. Programmatic Outcomes to be Achieved by the Waiver:

- Heightened return on training investments by increasing training provider accountability
- More efficient use of WIA funding for ITA's
- Increased accuracy and comprehensive information provided by training providers
- Enhanced DCVOS automated workforce delivery system features that will collect, organize and provide performance information for providers on the ETPL
- Maximized informed consumer choice by providing high impact, demand driven training options

5. State Local Statutory or Regulatory Barriers:

There are no existing state or local statutory or regulatory barriers to the implementation of this waiver request.

6. Individuals Impacted by the Waiver:

The waiver will positively impact job seekers, providers of training services, One Stop Career Center staff, DOES and the DCWIC.

7. Process Used to Monitor Progress in Implementing the Waiver:

DOES has in place a monitoring and performance accountability system that measures and evaluates result for employers and jobseekers accessing the District's network of One-Stop Career centers. On a monthly and quarterly basis, DOES analyzes customer enrollment and training provider service levels, program expenditures, and performance outcomes. In addition, program monitors conduct onsite quarterly technical assistance reviews designed to assure that contract requirements are being met for all WIA programs. On an annual basis, comprehensive monitoring is conducted onsite utilizing outcome reports generated from DOES's District wide database. Should this waiver request be granted, DOES will ensure regular review of the impact of waiving the time limit observed for initial eligibility of providers of training services before being considered for subsequent eligibility determinations.

8. Process for Notice of Local Boards and Opportunity to Comment:

DCWIC sought the input of DOES and other stakeholders during the development of the waiver request. DOES administrators met to review their expenditure levels and program needs and ultimately received unanimous support for the submission of this waiver. Once the waiver document is finalized, it will be posted on the public web site maintained by DOES to allow for public comment on its content and potential impact. In addition a copy of the waiver will be available for public inspection at DOES offices, and electronic copies of the waiver will be sent via e-mail to workforce centers.