

Waiver: Competitive Procurement of Youth Program Elements under the WIA Youth Formula Grant Program

Statutory and/or regulatory requirements to be waived

Minnesota requests the waiver of WIA Section 123, which requires the competitive selection of eligible providers of youth activities, for the following three program elements: paid and unpaid work experience, supportive services and follow-up services.

Actions undertaken to remove state or local barriers

We are unaware of any state or local barriers to implementing the requested waiver.

Goals and expected programmatic outcomes of waiver

This waiver request supports the following overarching goals pertaining to the delivery of youth services in Minnesota:

- Enhance continuity and efficiency of service delivery
- Minimize duplication of effort
- Maximize public investment
- Improve services to the neediest youth
- Leverage and coordinate resources

In some areas of the state, there are not enough service providers to make a selection on a competitive basis, and the administrative costs associated with the formality of a competitive process reduce the already limited resources available to serve the neediest youth. This waiver would give the fiscal agent/grant recipient the option of providing the three program elements above directly or through partner agencies.

Through co-enrollment, Minnesota WSAs integrate the delivery of WIA youth services with services funded by other federal (e.g. TANF) and state (e.g. Minnesota Youth Program) resources. More flexibility in the procurement process will facilitate continued co-enrollment and integration.

The WIA Youth program operates on the premise of long-term participation, during which time strong relationships are likely to be formed between youth participants and youth service provider staff. Strong relationships between the staff and youth are a key factor in youth success. When a different youth provider is sought through a competitive process, services may be disrupted and these relationships may be severed. The established relationship may end and youth are more likely to leave the program because of instability.

If this waiver is approved, expected outcomes include:

- Effective case management and follow-up services
- Less movement of youth participants among multiple service providers

- Longer participation of youth
- Effective use of limited resources to best meet the needs of participants
- Reduction in administrative costs of providing services when there are not enough providers in a region to warrant a competitive process
- Longitudinal tracking of data to better evaluate program outcomes

Individuals impacted by the waiver

Eligible youth, youth service providers and fiscal agents/grant recipients will benefit from this waiver.

Process for monitoring progress in implementation

Local areas wishing to implement this waiver are required to state so in their Local WIA Plan. State staff review the implementation of this waiver during the annual on-site review of WIA youth programs.

Notice to affected local boards

Local boards and staffs were notified of the waiver request and given a thirty day direct opportunity to comment on this specific waiver. The comment period ended on May 11, 2012.

Public comment

The Minnesota Department of Employment and Economic Development (DEED) provided notice of the waiver request to local boards and staffs and posted the waiver request on its website for a thirty day public comment period, which ended May 11, 2012.

No comments from the general public were received. DEED received the following comments from local boards/staff:

WSA 10, City of Minneapolis (Teresa Harrold):

"WSA 10 supports all five of the waivers proposed, especially the waiver to allow youth enrolled in alternative school programs to be classified as dropouts/out-of-school youth so the definition is the same under WIA and YouthBuild programs."

WSA 8, Southeast MN (Marge Kuethe):

"Workforce Development, Inc. is supportive of the waiver request."