

**STATE OF CALIFORNIA  
WORKFORCE INVESTMENT ACT (WIA)  
WAIVER REQUEST**

**Waiver Relating to Performance Measures for Summer Youth Activities Funded  
by WIA and Temporary Assistance for Needy Families (TANF)**

The California Workforce Investment Board (State Board) and the Employment Development Department (EDD), as the administrative entity of the WIA, submit this request for a waiver to the use of Common Measures for Youth enrolled in summer employment activities funded in conjunction with TANF funds.

In keeping with the guidelines set forth at WIA Section 189(i)(4)(B) and 20 Code of Federal Regulations Part 661.420(c), please accept the following as a request for waiver.

The State Board respectfully requests a waiver to Common Measures for youth to allow the State to use the work readiness indicator as the only performance measure for youth co-enrolled in WIA and TANF summer employment activities. This waiver request would permit the work readiness indicator to be used for three consecutive program periods: May 1, 2014 through September 30, 2014; May 1, 2015 through September 30, 2015; and May 1, 2016 through September 30, 2016.

**A. Statutory or Regulatory Requirements to be Waived**

Common Measures for Youth specified in Employment and Training Agency Training and Employment Guidance Letter 17-05 and approved for use by California on December 11, 2007.

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

The previously approved waivers for May 1, 2013 through September 30, 2013 were pivotal to the success of the Summer Youth Program. In 2013, the program saw enrollment of 2,787 youth participants, all of whom were placed in training and employment. These youth were co-enrolled in both WIA and TANF, a leveraging method that allowed for the better service of the needs of Los Angeles County youth.

These waivers allowed Los Angeles County to focus on work readiness indicators in addition to allowing local area to offer youth the unique opportunity to explore work experiences that may not have been possible without combining WIA and TANF funds. Without this waiver, the performance requirements would impede the true intent of this summer employment program as concerns over performance would overshadow the great opportunities and choices given to California's youth during these challenging economic times.

Los Angeles County will continue to seek out other funding opportunities to increase summer employment opportunities youth. Typically, Los Angeles estimates that it will serve approximately 700 youth during each Summer Youth program period. However, in recent years; this area has managed to double if not triple its estimate of enrolled youth participants to be served under this waiver.

Allowing the local area this flexibility will in turn allow them to use more of their resources to focus on the critical goal of offering at-risk youth with subsidized summer employment activities, without creating new administrative burdens.

This waiver becomes even more critical as the youth employment opportunities have continued to remain low during this time of economic downturn. Los Angeles has also added the "Earn & Learn" model to their program which requires a mandatory 12 hours of classroom personal development training and 100 hours of worksite time. This training is intended to improve youth basic soft skills. Youth are then exposed to career pathways in high growth sectors.

Granting this waiver will ensure the continuation of the Los Angeles Summer Youth program. Also, granting this waiver for an extended period of time to cover three separate program years - May 2014 through May 2016 - will guarantee that the program can begin its service delivery without any lapse in service and eliminate the need to seek this waiver each year. If granted, the local area can begin expeditiously to serve low income participants as well as those with barriers to employment, such as out-of-school youth and those most at risk of dropping out; youth in and aging out of foster care; youth offenders and those at risk of court involvement; homeless and runaway youth; children of incarcerated parents; migrant youth; Indian and Native American youth; and youth with disabilities.

### **C. State or Local Statutory or Regulatory Barriers**

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

### **D. Description of Individuals Impacted by the Waiver**

Youth participants ages 16-21 are impacted by this waiver request. In addition, the local area, local TANF agencies and their business partners that employ the eligible youth will be impacted. Only youth participants co-enrolled in both the WIA youth program and TANF will be affected by this waiver. Currently, the requested waiver will only affect the Los Angeles County Workforce Investment Area. If other local areas desire to utilize the waiver, they will be required to submit separate requests to EDD.

It is anticipated that where these TANF and local area partnerships are formed and already operating, both the WIA youth funds and TANF funds will be used to pay wages for youth this summer. Some of these youth will be eligible for both funding sources and may be co-enrolled in both programs. Each youth will meet the eligible criteria for

their appropriate funding source (age, eligibility, etc.). Additionally, both WIA and TANF funding will be used to pay youth wages plus contractor costs to run and supervise the youth as appropriate.