

Expanded Credential Definition for Apprenticeship Programs for Youth

Workforce Innovation and Opportunity Act Waiver Request Template

Under the Secretary of Labor's waiver authority outlined in Section 189(i)(3)(A) of the Workforce Innovation and Opportunity Act (WIOA) and 20 CFR 679.600, the Secretary may waive certain provisions of WIOA Title I Subtitle A, B, and E and provisions found in Sections 8-10 of the Wagner-Peyser Act. WIOA Section 189(i)(3)(B) and 20 CFR 679.620 identify elements that must be included in a waiver request. A State may request a waiver in its overall Unified or Combined State Plan submission or modification. Or, if submitting separate from the State Plan submission, States may use this template to request a waiver. States may also request a waiver using their own format or form, as long as elements required by WIOA are addressed in the request. After reviewing a state's initial request, the Employment and Training Administration (ETA) may request additional information if necessary to complete its review.

To submit a waiver request, e-mail this completed form (or state-developed form) along with a cover letter to WIOA.Plan@dol.gov and the appropriate ETA regional office. ETA will also accept hard copy submissions.

Date: February 15, 2018

State: Illinois

Agency: Illinois Department of Commerce and Economic Opportunity

Provide narrative for the following elements:

Statutory and/or regulatory requirements to be waived

Indicate which part of the WIOA or the regulations the state would like to waive.

The State of Illinois is seeking a waiver from Section 116 of WIOA and 20 CFR 677.155, to expand the definition of the credential required to be issued specifically by Registered Apprenticeship programs during program participation or within one year after "exit".

Actions undertaken to remove state or local barriers

Describe the actions undertaken to remove state or local barriers.

Expanded Credential Definition for Apprenticeship Programs for Youth

There are currently no state or local statutory or regulatory barriers to implementing the requested waiver. State of Illinois regulations and policy align with current federal law.

Goals and expected programmatic outcomes of waiver

Describe and specify how the waiver will help the state achieve an identified strategic goal or set of goals that it has outlined in its State Plan. If possible and appropriate the type of waiver requested, provide quantifiable projections for programmatic outcomes that will result from the waiver.

Background

Illinois is leveraging multiple initiatives to further integrate apprenticeship opportunities into the WIOA required and optional program partners throughout the state. The Governor has mobilized a broad cross-section of apprenticeship stakeholders to drive this important planning process. Representing a range of perspectives and resources, these individuals are serving on the Illinois Apprenticeship Committee (a standing committee of the Illinois Workforce Innovation Board (IWIB)) and oversee this planning effort and continue into implementation. This committee is encouraging demonstration projects as well as making policy and technical assistance recommendations.

A waiver, to expand the definition of the credential required to be issued by an apprenticeship program during program participation or within one year after "exit" would greatly increase the promotion and utilization of WIOA-supported apprenticeships.

Outcomes

Given the work-based learning and academic structure of apprenticeship programs, we request allowing the credential to include one or more of the following Registered Apprenticeship components completed in one year:

- Attainment of college credits - not just a two-year credential or certificate, associates, or another measure that takes more than one year to earn.
- The USDOL recommended 144 hours of related training instruction.
- The USDOL recommended minimum of 2000 hours of OJT.

These components of an expanded credential definition related to Registered Apprenticeship maintain the key qualities of a Recognized Post-Secondary Credential found in Section 3(52) of WIOA including industry-recognized, portable, third-party validated/accredited, and stackable.

Expanded Credential Definition for Apprenticeship Programs for Youth

Approval of this waiver will provide additional flexibility and support an increase in the usage of WIOA supported apprenticeships and seeing WIOA funding as an appropriate funding source. This waiver could also positively impact the other WIOA performance indicators.

It is anticipated that expanding the definition will ease some of the apprehension of LWIBs in using apprenticeship training models

Department of Labor's policy priorities

Describe how the waiver will align with the Department's policy priorities, such as:

- *Supporting employer engagement;*
- *Connecting education and training strategies;*
- *Supporting work-based learning;*
- *Improving job and career results; and*
- *Other priorities as articulated in guidance.*

This waiver aligns with not only the Department of Labor's priorities, but also with those of the State of Illinois. Within the Illinois WIOA Unified Plan, are examples demonstrating the importance of apprenticeship programs at all levels, and how Illinois is moving toward strategies that expand both traditional and non-traditional type apprenticeship programs. As stated above, expanding the definition will increase the level of participation in apprenticeship and remove perceived barriers that may currently limit enrollment in them.

Individuals impacted by the waiver

Describe which populations the waiver will benefit, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment.

Both the education and workforce system will realize the benefits by an expanded definition of the credential required to be issued by an apprenticeship program during program participation or within one year after "exit". This will greatly increase the promotion and utilization of WIOA supported apprenticeships.

Process for monitoring progress in implementation

Describes the processes used to monitor the progress in implementing the waiver.

- *Monitor the progress in implementing the waiver;*

Expanded Credential Definition for Apprenticeship Programs for Youth

- *Provide notice to any local board affected by the waiver;*
- *Provide any local board affected by the waiver an opportunity to comment on the request;*
- *Ensure meaningful public comment, including comment by business and organized labor, on the waiver.*
- *Collect and report information about waiver outcomes in the State's WIOA Annual Report.*

The State will use the following approach for monitoring progress in implementation:

1. State staff involved with the administration of apprenticeship programming will provide ongoing technical assistance and oversight as it relates to the appropriateness and the effectiveness of this waiver. This information will be submitted regularly to the IWIB Evaluation and Accountability Committee.
2. Annual WIOA on-site programmatic reviews will include evaluation review of the impact the waivers have on programmatic goals and outcomes.
3. Additionally, the IWIB Evaluation and Accountability Committee will have the responsibility of ensuring the specific goals and outcomes achieved by the waiver are realized. Furthermore, the information gathered from the waiver will inform new or changes to policy as well as provide best practices.

This strategy ensures that the goals described above, as well as those outlined in the State's Unified Plan and the IWIB Strategic Plan, are consistent with established objectives of the WIOA and federal and state regulations.

Notice to affected local boards

Address how local boards affected by the waiver were notified of the request.

Local Boards via Board members and/or Board staff as well as WIOA partners and other interested stakeholders participate in policy development. Additionally, LWIBs receive the opportunity to participate in public comment period that includes webinars.

Public Comment

Provide a description of the proactive solicitation of public comments. At a minimum, post the proposed waiver request to the state's official website for comment. Ideally, develop a targeted outreach strategy to collect input and comment from all affected

Expanded Credential Definition for Apprenticeship Programs for Youth

stakeholders. Submit any comments or concerns collected in this manner and the outcome of the state's review of the public comments received.

In accordance with the WIOA Regulations at 20 CFR 676.135, Illinois is submitting a modification to its Unified State Plan, which is subject to the requirements outlined in the WIOA Regulations at 20 CFR 676.130(d) for public review and comment. As such, Illinois's waiver request posted on our website for comment and review by required parties and the public. USDOL will receive any comments provided.

Waiver Impact

Collect and report information about waiver outcomes in the State's WIOA Annual Report. The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver.

The IWIB Evaluation and Accountability Committee will have the responsibility of ensuring the specific goals and outcomes achieved by the waiver are realized. Furthermore, the information gathered from the waiver will inform new or changes to policy as well as provide best practices. Outcomes of the waiver will be reported in the WIOA Annual Report.