

State of Rhode Island Workforce Investment Act Waiver Request

IDENTIFICATION OF ELIGIBLE PROVIDERS OF YOUTH ACTIVITIES

Background

Subsequent to the passage of the Workforce Investment Act of 1998 (WIA), the State of Rhode Island's Local Workforce Investment Boards designated the Rhode Island Department of Labor and Training's One-Stop Career Centers to carry out the provisions of WIA. The Local Workforce Investment Boards made this designation for a number of reasons, not the least of which was because the One-Stop Center System had for years characterized one of the key intents of WIA; to foster the integration, collaboration, and cooperation among multiple funding streams and service providers in the area of workforce development.

Programs and services that are now offered at the One-Stop Career Centers include all DOL employment and training programs, including Registered Apprenticeships, certain employment and training programs for TANF recipients supported by the TANF agency (including the food stamp employment and training programs among others), Vocational Rehabilitation, and older worker programs. In addition, close collaboration among non-co-located service providers includes adult education and literacy programs, community-based organizations, mental health and drug rehabilitation centers, area technical centers and post-secondary educational institutions, Job Corps and others. These services are only offered to adults. Within this system, the One-Stop Career Centers provide case management services for adults that include intake; assessment; career, occupational, and financial counseling; coordination of education and training services; support services; and follow-up services. The formation over time of this integrated network of programs and services prompted the Governor to assign by Executive Order 05-18 the primary responsibility for the delivery of workforce development services to the One-Stop Career Centers of the Rhode Island Department of Labor and Training.

By contrast, in order to provide programs and services to youth, it is mandated by law that a competitive model be established. There are three notable problems associated with the existing competitive model:

- 1) Over the years there has been progressively less competition and an increasingly limited pool of willing subrecipients;
- 2) Subrecipients provide some of the required ten elements well but not all; and,
- 3) The cost to provide services in this manner is administratively burdensome and expensive.

This has resulted in a delivery system that serves a very low number of youth and one that relies on a network of service providers who are not equipped to deliver all ten youth program elements in a comprehensive and efficient manner.

To address this situation, Rhode Island proposes to utilize the Youth Center located on site at the One-Stop Career Center in Providence, and in the near future, at a Youth Center to be located on site in Pawtucket as the primary entry points for WIA youth services along with satellite offices to be determined. Access will also be ultimately be provided through internet as well. This we believe will lead to a more efficient, customer friendly and cost-effective system. Centralizing our youth delivery system at the Youth Center located at the One-Stop will enable us to develop partnerships, through formal Memoranda of Understanding with State, local and community-based agencies who have expertise in delivering youth services such as tutoring, referral to alternative secondary school offerings, leadership development opportunities, supportive services, adult mentoring, follow-up services and comprehensive guidance and counseling. With respect to summer employment opportunities and paid and unpaid work experience, we plan to competitively procure those program elements.

We are proposing that our Youth Centers will be staffed with a local Workforce Board youth services coordinator whose responsibility will be to oversee all youth services as well as staff from partnering agencies. The youth services coordinator will be responsible for determining which program elements cannot be delivered through partnership arrangements and need to be competitively procured. This approach will enable the local Workforce Boards to better manage performance. Additionally, this approach will enable vendors to apply for the delivery of program elements that are within their realm of expertise.

The Governors Workforce Board as well as the two Local Workforce Investment Boards have endorsed the concept of youth services being accessed through the One-Stop Career Centers.

A. Statutory or Regulatory Requirements to be Waived:

Rhode Island requests on behalf of the State (GWB) and Local Workforce Boards (LWIBs) a waiver of the requirements of Sections 117(d)(2)(B), 117(h)(4)(B)(i), and Section 123 that requires eligible providers of youth activities be selected by awarding grants or contracts on a competitive basis. These activities include the “ten program elements” listed under WIA section 129(c).

It is the intent of this waiver request that when these services can be provided by existing staff and/or through existing or prospective partner arrangements, then the option should exist for the local boards to use these services. If services cannot be provided by existing program staff or partner agencies, there would be a competitive procurement in compliance with the Section 123 of the regulations so that all ten program elements would always be available to eligible youth.

B. Goals and Expected Programmatic Outcomes if Waiver is Granted

The immediate and long-term impact of granting this waiver request is:

- The local Workforce Investment Boards will be better positioned to manage performance;
- To create points of collaboration for all youth service providers (public and non-public) affording seamless services to youth;
- To allow Rhode Island to maintain an effective, cohesive, and integrated network of service providers centered on the One-Stop System as required by the Governor's Executive Order No. 05-18;
- The establishment of an easy-to-navigate, coherent case management system for youth that requires minimal movement among service providers;
- To create partnerships to serve youth similar to the partnerships that currently exist by Memoranda of Understanding to serve Adults in the One-Stop Career Centers;
- To increase access to youth services under WIA by better utilizing Youth Centers in the existing One-Stop Career Centers, and creating appropriate satellite centers and website;
- To create the opportunity for the Local Boards to use current program staff and partner agreements to provide required services and to seek competitive procurement of outside services when needed. This is critical and necessary given the current state of resources and limited number of providers, and results in the maximum investment of available resources to directly serve to youth; and
- To allow RIDLT One-Stop Career Centers to build on the existing model of collaborative partnerships.

C. State Statutory Barriers:

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

D. Description of the Individuals Impacted by the Waiver:

The waiver will positively impact all Local Workforce Areas (LWIAs) and Local Workforce Boards (LWIB), training providers, local One-Stop staff, and customers.

E. Description of the Process to Monitor Waiver Progress:

The State Workforce Investment Office of the Rhode Department of Labor and Training already has the responsibility to monitor the implementation and deliverables.

F. Description of process used to provide notice to any Local Board affected by the Waiver;

Should the waiver be granted, the RI Department of Labor and Training's State Workforce Investment Office will issue a Workforce Investment Notice (WIN) that will be disseminated to appropriate officials of the Local Workforce Areas. The WIN will also be posted on the RIDLT website.

G. Opportunity to Comment on the Waiver Request:

This waiver request was posted to the State Workforce Investment Office (SWIO) Website at <http://www.DLT.RI.Gov/WIO> on August 23, 2006. The notice of hearing was published in a paper of general circulation on August 27, 2006 allowing for a fifteen (15) day public comment period. A public hearing was conducted on September 18, 2006. There were no adverse comments received during the comment period or public hearing.

This Youth Waiver request was drafted in cooperation with the two local areas. As with all major workforce policies and procedures, the State has solicited dialogue and input from the local workforce boards and staff concerning the impact of this request. The State Board supports this request. The aforementioned process ensured a review by interested parties from business, organized labor and others throughout Rhode Island.

H. Public Comment on the Waiver Request:

As noted in Section "G" above, the Youth Waiver draft request was published at <http://www.DLT.RI.Gov/WIO> which is the State website and a public comment and hearing process was conducted. Copies of this waiver request were forwarded to the local workforce areas.