

JUN 7 2010



The Honorable Tim Pawlenty  
Governor of Minnesota  
130 State Capitol  
75 Reverend Doctor  
Martin Luther King Jr. Boulevard  
St. Paul, Minnesota 55155

Dear Governor Pawlenty:

The Employment and Training Administration (ETA) is pleased to be able to respond positively to your requests for waivers of statutory and regulatory requirements under the Workforce Investment Act (WIA). This action is taken under the Secretary's authority to waive certain requirements of WIA Title I, Subtitles B and E, and sections 8-10 of the Wagner-Peyser Act. The requests are written in the format identified in WIA section 189(i)(4)(B) and 20 CFR 661.420(c), and appear to meet the standard for approval at 20 CFR 661.420(e). The following is the disposition of the State's submission (copy enclosed).

Requested Waiver: Waiver of performance measures for youth participants in summer youth employment activities and co-enrolled in TANF and WIA programs

The State has requested a waiver of the common performance measures for youth who participate in subsidized summer youth employment activities that utilize Temporary Assistance to Needy Families (TANF) Emergency Contingency funds and are co-enrolled in WIA-funded youth programs.

The requested waiver is approved and allows the State to use the work readiness indicator as the only indicator of performance for youth co-enrolled in WIA Youth and TANF programs and participating in subsidized summer youth employment activities. The waiver is effective from May 1, 2010, through September 30, 2010.

This waiver applies only to WIA Youth performance requirements; the State must comply with any reporting requirements established through the TANF Emergency Fund. ETA provided details for reporting WIA performance for summer youth activities in Training and Employment Notice No. 24-09, the Joint Letter from ETA and the U.S. Department of Health and Human Services Administration for Children and Families (ACF) regarding youth subsidized employment opportunities under the TANF Emergency Contingency fund.

Requested Waiver: Waiver to provide program design flexibility in serving youth participants in summer youth employment activities and co-enrolled in TANF and WIA programs

The State has requested a waiver of certain provisions under WIA Sec. 129(c) and 20 CFR 664 to allow Local Workforce Investment Area (LWIA) staff increased flexibility in program design. Through this waiver, the State will be able to provide program design flexibility in serving youth who participate in subsidized summer youth employment activities that utilize Temporary Assistance to Needy Families (TANF) Emergency Contingency funds and are co-enrolled in WIA-funded youth programs.

The requested waiver is approved. Specifically, the State is granted a waiver of statutory and regulatory provisions as follows:

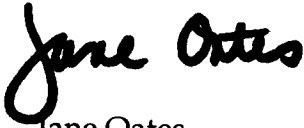
- Waiver of the requirement at WIA section 129(c)(2)(I) and 20 CFR 664.450(b) to provide a minimum of 12 months of follow-up services, to allow local areas to provide follow-up services with WIA Youth funds as deemed appropriate for such youth participants.
- Waiver of the requirement at WIA section 129(c)(1)(A) and 20 CFR 664.405(a)(1) to provide an objective assessment and the requirement at WIA section 129(c)(1)(B) and 20 CFR 664.405(a)(2) to develop an individual service strategy (ISS), to allow local areas to provide an assessment or ISS as deemed appropriate for such youth participants.
- Waiver of the requirement at WIA section 129(c)(1)(C)(1) and (2) and 20 CFR 664.600(b) to provide direct linkages to academic and occupational learning, to allow local areas the flexibility to determine whether it is appropriate that academic learning be directly linked to summer employment for each youth served with Recovery Act funds.

The waivers referred to above are effective from May 1, 2010 through September 30, 2010, and only apply to youth co-enrolled in WIA Youth and TANF programs and participating in subsidized summer youth employment activities. Youth transitioning to year-round WIA youth services after September 30, 2010 must have in place an objective assessment and individual service strategy as required by WIA. While the State is not required to connect academic and occupational learning opportunities to the work experience component of the program, ETA encourages these linkages whenever possible and appropriate.

The approved waivers are incorporated by reference into the State's WIA Grant Agreement, as provided for under paragraph 3 of the executed Agreement, and this constitutes a modification of the State Plan. A copy of this letter should be filed with the State's WIA Grant Agreement and the approved State Plan. In addition, as required by TEGL No. 14-00, Change 3, the State should address the impact this waiver has had on the State's performance in the WIA annual performance report, due on October 1 of each year.

We look forward to continuing our partnership with you and achieving better workforce outcomes. If you have any questions related to the issues discussed above, please contact Byron Zuidema, the Regional Administrator for Region V, at 312-596-5403 or [Zuidema.Byron@dol.gov](mailto:Zuidema.Byron@dol.gov).

Sincerely,

A handwritten signature in black ink that reads "Jane Oates". The signature is written in a cursive style with a large, looping initial "J".

Jane Oates  
Assistant Secretary

Enclosure

cc: Carl Stahlheber, Federal Project Officer for Minnesota, ETA Chicago Regional Office  
Byron Zuidema, Regional Administrator, ETA Chicago Regional Office

May 13, 2010

Ms. Janet Sten  
Division of Workforce System Support  
Employment and Training Administration  
U.S. Department of Labor  
200 Constitution Ave., NW, Room S-4231  
Washington, D.C. 20210

Mr. Byron Zuidema  
Regional Administrator  
USDOL-ETA-Region 5  
230 South Dearborn Street, 6<sup>th</sup> floor  
Chicago, IL 60604

Dear Ms. Sten and Mr. Zuidema:

The Minnesota Department of Employment and Economic Development (DEED) is resubmitting two waivers related to Minnesota's proposed TANF-funded summer youth employment program for the period of May 1, 2010 through September 30, 2010. The changes are a result of our review of TEGL 26-09 (dated May 12, 2010). The revisions are highlighted in blue. The waivers relate to the WIA Youth Performance Measures and Program Design Flexibility for Youth who are co-enrolled in the TANF Summer Youth Program and the Regular WIA Youth Program, as follows:

- Waive the WIA Youth Performance Measures for youth who are co-enrolled in the WIA Youth Formula Grant and the TANF Summer Youth Employment Program. This waiver will allow the work readiness indicator to be the only indicator of performance for these participants.
- Waive the requirement to provide follow up services for not less than 12 months after the completion of the program, and allow local areas flexibility to provide follow up services as they deem appropriate.
- Waive the requirement to provide objective assessment, and grant local areas the flexibility to determine the type of assessment and individual service strategy that is appropriate for each youth participant.
- Waive the requirement that summer employment opportunities be directly linked to academic and occupational learning. Rather than requiring the linkage to academic and occupational learning for all youth, local areas will have the flexibility to determine based on each youth participant's individual need whether academic learning must be directly linked to summer employment.

In the interest of time, solicitation of Public Comments will occur concurrently with your consideration of these waivers. The draft waivers will be posted on the Public Comment page of the Department of Employment and Economic Development's policy website for 14 days and an e-mail will be delivered to the public comment listserv announcing the posting of the waiver. At the end of the comment period, we will submit a copy of any comments to DOL/ETA.

If you have any questions related to these waivers, please contact Kay Tracy at 651-259-7555, or e-mail [kay.tracy@state.mn.us](mailto:kay.tracy@state.mn.us).

Sincerely,



Bonnie Elsey  
Director, Workforce Development Division

Attachments: Waivers

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*An Equal Opportunity Employer and Service Provider*

**State Of Minnesota  
Workforce Investment Act  
Waiver Request**

**Request to Waive WIA Youth Statutory Measures for Youth Co-Enrolled in the TANF Funded Summer Youth Employment Program and WIA Youth Program between May 1, 2010, and September 30, 2010**

The Employment and Training Administration (ETA) and the US Department of Health and Human Services Administration for Children and Families (ACF) issued a joint letter on January 19, 2010, encouraging the workforce and human services agencies to work together to explore all funds available for the creation and expansion of subsidized summer employment programs for low-income youth.

This letter explains that even before the recent recession the overall teen employment rate was appallingly low, reaching levels unheard of for 60 years. Each year, the 16 to 24 year old labor force increases sharply during the months of April through July, and the current recession has eliminated many employment opportunities for youth in this age group. July of 2009 marked the lowest employment rate for this month on record since 1948, with only 51.4 percent of this age range employed.

*Subsidized employment provides valuable skills and work experience for young people, and serves as a stepping stone on the path to unsubsidized employment. For example, over 10,000 older youth in the Workforce Investment Act (WIA) subsidized summer youth employment this past summer transitioned into unsubsidized employment. By accessing resources made available by the Temporary Assistance for Needy Families (TANF) program and WIA employment and training program, State and local TANF agencies and Workforce Investment Boards (WIBs) have the potential to bring additional subsidized job opportunities to youth across the nation this summer. (Training and Employment Notice No. 24-09)*

It is as a result of this letter and the State of Minnesota's concern for the plight of youth during these uncertain economic times that the Minnesota Department of Employment and Economic Development (DEED) and the Department of Human Services (DHS) have decided to partner and create summer employment opportunities for youth.

**The Minnesota Department of Employment and Economic Development (DEED) requests permission from the U.S. Department of Labor to waive the statutory WIA youth performance measures for youth who are co-enrolled in WIA Youth Activities and Minnesota's TANF Summer Youth Program only during the time period May 1, 2010 to September 30, 2010.** This waiver would use the Work Readiness Indicator as the only indicator of performance for youth who are co-enrolled in WIA Youth and TANF Summer Youth Employment (funded through the TANF Emergency Contingency Fund) only during the above time period.

The use of such a waiver will allow Minnesota the flexibility to design a summer program that focuses on work readiness, work experience, and preparing youth for long-term employment opportunities rather than on meeting performance measures that do not align with the purpose of a summer youth employment program.

This waiver request is similar to provisions included in the American Recovery and Reinvestment Act (ARRA). Training and Employment Guidance Letter (TEGL) 14-08 allowed states to use the work readiness indicator as the only performance measure for youth participating in "summer employment" only.

*The work readiness portion of the skill attainment rate will be the only indicator used for youth that participate in "summer employment" only. The basic and occupational skills portions of the skill attainment rate and the literacy/numeracy gains measure will not be required for youth that participate in summer employment only. In addition, no other WIA or Common Measure indicator will be required for youth in summer employment only. (TEGL 14-08)*

This waiver request is written in the format identified in WIA Section 189(i)(4)(B) and in WIA Regulations 20 CFR 661.420(c).

**1) Specific Statutory/Regulatory Requirement to be Waived:**

Minnesota is requesting WIA Section 136(b)(2)(A) be waived to dismiss from consideration the WIA statutory performance measures and use the work readiness portion of the skill attainment rate as the only indicator of performance for youth co-enrolled in the regular WIA Youth Formula funds and TANF Emergency Contingency funds for the summer youth employment program only.

**2) Goals to be Achieved by the Waiver:**

The goal of this waiver is to support Minnesota's efforts to improve services to the neediest youth as stated in Minnesota's Unified Plan, and evidenced by our state's longstanding participation in the federal Shared Youth Vision initiative and now the successor collaboration, the federal Interagency Working Group on Youth Programs.

This waiver will provide Minnesota with more flexibility to promote subsidized summer employment opportunities for low-income youth allowable under ARRA TANF Emergency Contingency funding, and would support the request made in the January 19, 2010 joint letter from DOL/ETA and HHS/ACF. The waiver will allow local areas to design a summer program that focuses on work readiness, work experience, and preparing youth for long-term employment opportunities rather than on meeting performance measures that do not align with the purpose of a summer youth employment program.

This waiver would allow Local Workforce Investment Boards (LWIBs) to utilize TANF Emergency Contingency funds to pay for wages and fringe benefits for eligible youth participants while using WIA Youth Formula funds to pay for staffing and administrative costs for serving these youth.

Since Minnesota's LWIBs have little or no remaining ARRA Youth money, this would allow them to co-enroll with regular WIA Youth Formula funds and still be accountable for the single measure of performance for youth who are participating in a summer program which includes a work experience component.

**3) State or Local Statutory or Regulatory Barriers:**

There are no existing state or local statutory or regulatory barriers to implementing this waiver. Upon notification of approval of this waiver, DEED will incorporate it into policy and distribute the new policy to LWIBs.

**4) Description of Waiver Goal and Expected Programmatic Outcomes:**

The goal of this waiver is to allow Minnesota's LWIBs to leverage TANF Emergency Contingency Funds through the Minnesota Department of Human Services (DHS) to pay participant wages and fringe benefits for a group of needy youth who are unlikely to be otherwise employed during the summer of 2010, and also allow the youth to benefit from the services and activities that can be funded through WIA but not the TANF Emergency Contingency funding.

Youth participants in the 2010 Minnesota TANF Summer Youth Program will gain work experience at a wage of at least \$7.25 per hour for up to 30 hours per week for up to 12 weeks. Older youth may work

additional weeks or hours. The wages and fringe benefits will be funded from the TANF Emergency Contingency Fund. WIA funds would be used to pay for other expenses such as payroll and administration costs, staffing and case management, support services such as transportation, child care and other allowable expenses deemed necessary for co-enrolled youth.

During the time the waiver is in effect, service providers will be actively working to connect these youth to further education and training opportunities through WIA Youth, WIA Adult, WIA Core Services, other state-funded programs such as the Minnesota Youth Program and the Minnesota Youthbuild Program, and/or programs operated by local educational agencies as appropriate on an individual basis. It is anticipated that youth who do not meet the work readiness measure will be transitioned into these other programs to continue focus on improving employability skills such as positive work habits and attitudes and job retention. Additionally, youth who show the need for further development of academic abilities may be enrolled into services to improve academic performance skills such as completing tasks, understanding instructions, mathematics and reading comprehension.

**5) Individuals Impacted by the Waiver:**

Approval of this waiver will allow DEED and LWIBs to partner with the Minnesota DHS to utilize TANF Emergency Contingency Funds to provide a summer youth employment experience for a group of youth who might not be otherwise served.

Youth who will be served through Minnesota's TANF Summer Youth Employment Program include those in the following categories:

- Teen parents, ages 16 through 24, who are on the Minnesota Family Investment Program (MFIP -- Minnesota's TANF Program)
- Younger youth, ages 16 through 18, who are in MFIP households but not part of the MFIP grant
- Older youth, ages 19 through 24, who are in MFIP households but not part of the MFIP grant
- Other older and younger youth, ages 14 through 24, who are in families at or below 200% of the federal poverty level with a minor child in the household

**An estimate of the *number* of youth that will be co-enrolled in the WIA Youth program and in TANF Summer Youth Employment activities during PY 2010:**

Of the 3,000 youth anticipated to be served through the 2010 Minnesota TANF Summer Youth Program, approximately 1,800 (60 percent) are expected to be co-enrolled in WIA Youth.

**An estimate of the *percent* of PY 2010 WIA Youth program enrollees that will be co-enrolled TANF summer youth employment participants only, and not participate in the WIA youth program beyond summer:**

It is estimated that 30 percent of PY 2010 WIA Youth program enrollees will be co-enrolled in the TANF summer youth program and not participate in the WIA youth program beyond summer.

**6) Process for Monitoring Implementation of the Waiver:**

DEED will take the following steps toward implementation of this waiver:

DEED will enter into an Interagency Agreement with DHS to access TANF Emergency Contingency funds for the Minnesota TANF Summer Youth Employment Program.

The waiver will be incorporated into a state guideline distributed to all local areas.

State staff will review the implementation of this waiver during the annual on-site review of WIA youth programs. Monitoring would ensure correct documentation of the youth participants who are co-enrolled in TANF and WIA funding which will be tracked and reflected in the Individual Service Strategy and Youth Employment Plan. Information related to the implementation of this waiver will be collected in the State's Workforce One system and will be available for review on a regular basis.

Technical assistance will be provided to all LWIBs by DEED and DHS as appropriate to ensure swift, successful implementation of the Minnesota TANF Summer Youth Program.

**7) Opportunity for Local Boards to Comment on the Waiver Request:**

Local boards and staffs have been notified of the waiver request and are being given a fourteen-day direct opportunity to comment on this specific waiver. Copies of any comments received will be forwarded to the USDOL national office and Chicago regional office.

**8) Public Comment on the Waiver Request:**

DEED intends to place this waiver request on its website for a fourteen-day public comment period and send a notice to interested individuals on DEED's mailing list. Copies of any comments received will be forwarded to the USDOL national office and Chicago regional office.

**State Of Minnesota  
Workforce Investment Act  
Waiver Request**

**Provision of Program Design Flexibility to Serve Youth Co-Enrolled in the TANF Funded Summer Youth Employment Program and WIA Youth Program between May 1, 2010, and September 30, 2010**

The Employment and Training Administration (ETA) and the US Department of Health and Human Services Administration for Children and Families (ACF) issued a joint letter on January 19, 2010, encouraging the workforce and human services agencies to work together to explore all funds available for the creation and expansion of subsidized summer employment programs for low-income youth.

This letter explains that even before the recent recession the overall teen employment rate was appallingly low, reaching levels unheard of for 60 years. Each year, the 16 to 24 year old labor force increases sharply during the months of April through July, and the current recession has eliminated many employment opportunities for youth in this age group. July of 2009 marked the lowest employment rate for this month on record since 1948, with only 51.4 percent of this age range employed.

*Subsidized employment provides valuable skills and work experience for young people, and serves as a stepping stone on the path to unsubsidized employment. For example, over 10,000 older youth in the Workforce Investment Act (WIA) subsidized summer youth employment this past summer transitioned into unsubsidized employment. By accessing resources made available by the Temporary Assistance for Needy Families (TANF) program and WIA employment and training program, State and local TANF agencies and Workforce Investment Boards (WIBs) have the potential to bring additional subsidized job opportunities to youth across the nation this summer. (Training and Employment Notice No. 24-09)*

It is as a result of this letter and the State of Minnesota's concern for the plight of youth during these uncertain economic times that the Minnesota Department of Employment and Economic Development (DEED) and the Department of Human Services (DHS) have decided to partner and create summer employment opportunities for youth.

**The Minnesota Department of Employment and Economic Development (DEED) submits this request for a general waiver to allow flexibility in youth program design requirements to youth co-enrolled in Minnesota's TANF Summer Youth Program and the WIA Youth Program between May 1, 2010 and September 30, 2010.** Specifically, the State of Minnesota requests flexibility in providing services to these youth as follows:

- Waive the requirement to provide follow-up services for not less than 12 months after the completion of the program, and allow local areas flexibility to provide follow-up services as they deem appropriate.
  - Given that summer employment programs usually run for 8 to 10 weeks, Local Workforce Investment Boards (LWIBs) will have the flexibility to determine if and when the 12-month follow-up requirement will be required for youth participating only in the TANF-funded summer youth employment program. LWIBs should provide follow-up services when deemed appropriate for such individuals.
- Waive the requirement to provide an objective assessment, and grant local areas the flexibility to determine the type of assessment and individual service strategy (ISS) that is appropriate for each youth participant.

- Although some level of assessment and development of an ISS is required, a full objective assessment and comprehensive ISS as specified in the WIA Regulations is not required for these youth.
- Waive the requirement that summer employment opportunities be directly linked to academic and occupational learning.
  - Rather than requiring the linkage to academic and occupational learning for all youth participating only in the TANF-funded summer youth employment program, local areas will have the flexibility to determine for each youth participant whether academic learning must be directly linked to summer employment.

This waiver request is similar to provisions included in the American Recovery and Reinvestment Act (ARRA) through Training and Employment Guidance Letter (TEGL) 14-08:

- *Local areas have the flexibility to determine if 12 month follow-up will be required for youth served with Recovery Act funds during the summer months only (May 1 through September 30). Local areas should provide follow-up services when deemed appropriate for such individuals. (TEGL 14-08)*
- *Local areas have the flexibility to determine the type of assessment and Individual Service Strategy (ISS) for youth served with Recovery Act funds during the summer months only and provide the type of assessment deemed appropriate for each individual. (TEGL 14-08)*
- *Local areas have the flexibility to determine whether it is appropriate that academic learning be directly linked to summer employment for each youth served with Recovery Act funds during the summer months only. (TEGL 14-08)*

This program flexibility will enable local areas to develop service strategies that will better meet the needs of these youth during the summer months. In particular, we anticipate it will be easier to work with these youth once they are actively engaged in work experience activities. As they enhance their work readiness skills, participate in career planning activities and gain a better understanding of available workforce development services, we believe that assessment and service strategy development will be an iterative process.

This waiver request is written in the format identified in WIA Section 189(i)(4)(B) and in WIA Regulations 20 CFR 661.420(c).

**1) Specific Statutory/Regulatory Requirement to be Waived:**

Minnesota is requesting waiver of the following youth program design requirements in WIA Section 129:

**Sec. 129(c)(1)(A)** Provide an objective assessment of the academic levels, skill levels, and service needs of each participant, which assessment shall include a review of basic skills, occupational skills, prior work experience, employability, interests, aptitudes (including interests and aptitudes for nontraditional jobs), supportive service needs, and developmental needs of such participant, except that a new assessment of a participant is not required if the provider carrying out such a program determines it is appropriate to use a recent assessment of the participant conducted pursuant to another education or training program.

**Sec. 129(c)(1)(B)** Develop service strategies for each participant that shall identify an employment goal (including, in appropriate circumstances, nontraditional employment), appropriate achievement objectives, and appropriate services for the participant taking into account the assessment conducted pursuant to subparagraph (A), except that a new service strategy for a participant is not required if the provider carrying out such a program determines it is appropriate to use a recent service strategy developed for the participant under another education or training program.

**Sec. 129(c)(1)(C)(1) and (2)** Programs need to provide (i) preparation for postsecondary educational opportunities, in appropriate cases; (ii) strong linkages between academic and occupational learning; (iii) preparation for unsubsidized employment opportunities, in appropriate cases; and (iv) effective connections to intermediaries with strong linkages to (I) the job market; and (II) local and regional employers.

**2) Goals to be Achieved by the Waiver:**

The goal of this waiver is to support Minnesota's efforts to improve services to the neediest youth as stated in Minnesota's Unified Plan, and evidenced by our state's longstanding participation in the federal Shared Youth Vision initiative and now the successor collaboration, the federal Interagency Working Group on Youth Programs.

This waiver will provide Minnesota with more flexibility to promote subsidized summer employment opportunities for low-income youth allowable under ARRA TANF Emergency Contingency funding, will support the request made in the January 19, 2010 joint letter from DOL/ETA and HHS/ACF, and will allow local areas to design a summer program that focuses on work readiness, work experience, and preparing youth for long-term employment opportunities.

**3) State or Local Statutory or Regulatory Barriers:**

There are no existing state or local statutory or regulatory barriers to implementing this waiver. Upon notification of approval of this waiver, DEED will incorporate it into policy and distribute the new policy to LWIBs.

**4) Description of Waiver Goal and Expected Programmatic Outcomes:**

Flexibility in program design will allow a simplified and streamlined delivery of services that will allow local areas to serve a greater number of youth during the summer months. The main goal that will be achieved through the granting of this waiver will be to provide these co-enrolled youth participating only in the TANF-funded summer youth employment program with more time to focus on career planning, to identify employment goals and to participate in additional workforce development activities that better prepare them for securing long-term future employment.

Youth participants in the 2010 Minnesota TANF Summer Youth Program will gain work experience at a wage of at least \$7.25 per hour for up to 30 hours per week for up to 12 weeks. Older youth may work additional weeks or hours. The wages and fringe benefits will be funded from the TANF Emergency Contingency Fund. WIA funds would be used to pay for other expenses such as payroll and administration costs, staffing and case management, support services such as transportation, child care and other allowable expenses deemed necessary for co-enrolled youth.

During the time the waiver is in effect, service providers will be actively working to connect these youth to further education and training opportunities through WIA Youth, WIA Adult, WIA Core Services, other state-funded programs such as the Minnesota Youth Program and the Minnesota Youthbuild Program, and/or programs operated by local educational agencies as appropriate on an individual basis. It is anticipated that youth will be transitioned into these other programs as appropriate to continue focus on improving employability skills such as positive work habits and attitudes and job retention. Additionally, youth who show the need for further development of academic abilities may be enrolled into services to improve academic performance skills such as completing tasks, understanding instructions, mathematics and reading comprehension.

**5) Individuals Impacted by the Waiver:**

Approval of this waiver will allow DEED and LWIBs to partner with the Minnesota DHS to utilize TANF Emergency Contingency Funds to provide a summer youth employment experience for a group of youth who might not be otherwise served.

Youth who will be served through Minnesota's TANF Summer Youth Employment Program include those in the following categories:

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**6) Process for Monitoring Implementation of the Waiver:**

DEED will take the following steps toward implementation of this waiver:

DEED will enter into an Interagency Agreement with DHS to access TANF Emergency Contingency funds for the Minnesota TANF Summer Youth Employment Program.

The waiver will be incorporated into a state guideline distributed to all local areas.

State staff will review the implementation of this waiver during the annual on-site review of WIA youth programs. Information related to the implementation of this waiver will be collected in the State's Workforce One system and will be available for review on a regular basis.

Technical assistance will be provided to all LWIBs by DEED and DHS as appropriate to ensure swift, successful implementation of the Minnesota TANF Summer Youth Program.

**7) Opportunity for Local Boards to Comment on the Waiver Request:**

Local boards and staffs have been notified of the waiver request and are being given a fourteen-day direct opportunity to comment on this specific waiver. Copies of any comments received will be forwarded to the USDOL national office and Chicago regional office.

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