

Louisiana Workforce Commission
Workforce Innovation and Opportunity Act (WIOA) Waiver Requests Submission
Program Years 2024 - 2025

The statutory and/or regulatory requirements the State would like to waive

The state of Louisiana seeks approval of the following statutory waivers in accordance with Workforce Innovation and Opportunity Act (WIOA).

Waiver #1: Waiver of 20 CFR 681.550 to allow WIOA individual training accounts (ITAs) for in-school youth (ISY).

Waiver #2: Waiver associated with the requirement at WIOA Section 129(a)(4)(A) and 20 CFR 681.410 that the State and local area expend 75 percent of youth funds on out-of-school youth (OSY).

Actions Undertaken to Remove State of Local Statutory or Regulator Barriers

The state of Louisiana requested waivers for Program Year 2020 and Program Year 2021 waiving the requirement limiting Individual Training Accounts to only Out of School Youth age 16 -24 and allowing the use of Individual Training Accounts for In-School Youth (ISY) ages 16-21. The state also requested the same provision for Program Year 2022 and Program Year 2023.

The second waiver requested was to allow local areas to expend 50 percent instead of 75 percent of local Youth formula funds on Out of School Youth (OSY). Louisiana is requesting the continuation of both of the previous approved waivers granted by U.S. Department of Labor.

Both of the waivers expired at the end of Program Year 2023, which ended on June 30, 2024. At present, there is no state or local statutory or regulatory barriers that exist. Louisiana regulation and policy statements are in compliance with current federal law.

Strategic Goals

Louisiana's Workforce Innovation and Opportunity Act (WIOA) State Plan emphasizes improving educational accessibility and excellence at all levels, from K-12 to adult learning programs. Recent updates to Louisiana's K-12 accountability system further align with this vision by emphasizing work-based learning opportunities that prepare students for economic mobility and self-sufficiency. Despite these efforts, challenges remain, particularly in providing accessible pathways for in-school youth to gain valuable skills and credentials.

Louisiana has set a bold goal for 60 percent of all working-age adults to hold a degree or high-value credential by 2030. Achieving this requires innovative approaches, such as expanding opportunities for in-school youth to participate in training programs like Dual Enrollment and pre-apprenticeships through In-School Individual Training Accounts (ITAs).

With the approval of this waiver, local workforce areas can better align their resources with Louisiana's updated K-12 accountability system, which now rewards schools for providing work-based learning opportunities to students. By enabling the use of In-School ITAs, the waiver encourages school districts to collaborate with local workforce development areas to expand access to Dual Enrollment and pre-apprenticeship programs. These partnerships will help drive students toward meaningful career pathways while meeting the accountability framework's emphasis on preparing students for economic mobility. By integrating workforce development initiatives directly into the K-12 environment, this waiver will create a more seamless connection between education and career readiness, fostering stronger engagement from both students and schools.

Project Programmatic Outcomes Resulting from Implementation

The waiver allowed the local areas to enroll individuals that would normally not have been eligible for enrollment. This was due to the restrictions on use of ITA's on (ISY). These individuals would have to meet adult eligibility and use adult funding. The waiver allowed the local areas to use more WIOA Youth Funding and then use WIOA Adult Funding on those individuals that did not meet youth guidelines.

While the number of youths directly served by the ITA waiver may not have been substantial, its implementation laid the groundwork for future growth in collaboration with youth-serving entities, particularly K-12 schools. Moving forward, the waiver will play a pivotal role in strengthening partnerships between schools and local workforce development areas, enabling a more coordinated effort to expand work-based learning opportunities. By aligning resources with the new K-12 accountability system, this waiver will drive schools to integrate workforce development programs, fostering a stronger connection between education and career readiness for students statewide.

Success has taken place in several areas of the state due to the previously approved waiver. One example of a local area benefiting from the waiver is where an area deemed 23 (ISY) for services; 17 enrolled and 2 Work Experience. However, prior to the waiver no In-School Youth (ISY) were served. In addition, 17 ISY participated in Conover work reading training. Conover is a research-based soft skills assessment and training system designed to prepare individuals for the work place. Another example of the utilization of the waiver two years prior to having the waiver the local area had 2 (ISY) attending post-secondary education. After the waiver was approved, it resulted in an 80 percent increase of 11 (ISY).

The data tables below shows the state usage of the In-School Waiver during Program Year 2022 and Program 2023. During PY22 631, individuals were served as it relates to the In-School Youth waiver and 837 participants served during PY 23, which was an increase of 206 individuals served. Some of the local areas have been unable to provide the much-needed In-School Waiver to individuals due to the waiver expiring on June 30, 2024. Therefore, if individuals were still enrolled in a program they were able to complete studies after the waiver expiration.

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ISY-Waiver PY 2023			
LWDA	Total Participants Served	Total in Training	% of Total
11 - Jefferson Parish	193	71	36.79%
21 - East Baton Rouge Parish	190	4	2.11%
31 - Lafourche Parish	53	4	7.55%
51 - Calcasieu Parish	154	2	1.30%
60 - Sixth Planning District	84	1	1.19%
81 - Ouachita Parish	111	1	0.90%
83 - Franklin Parish	52	2	3.85%
Activity/Description	Distinct Users	Total Services	Percentage Used
	837	85	10.16%
Total Rows: 7			

ISY - Waiver PY 2022			
LWDA	Total Participants Served	Total in Training	% of Total
11 - Jefferson Parish	145	18	12.41%
14 - St. Charles Parish	51	1	1.96%
51 - Calcasieu Parish	185	1	0.54%
60 - Sixth Planning District	90	1	1.11%
81 - Ouachita Parish	101	2	1.98%
83 - Franklin Parish	59	2	3.39%
Activity/Description	Total Participants Served	Total Services	Percentage Used
	631	25	3.96%
Total Rows: 6			

Waiver of WIOA Section 129(a)(4)(A) and 20 CFR 681.410 reduced the requirements to spend 75 percent of youth funds on Out-of-School Youth (OSY) to 50 percent, allowing the local areas to allocate more resources towards ISY without neglecting OSY. The implementation of the waivers has led to a noticeable improvement in enrollment and training opportunities for ISY, despite the

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constraints of limited funding. By lowering the percentage of required spending on OSY and having the option for allowing ITAs for ISY, LWDA's effectively enhances the services delivery, balancing the needs of both ISY and OSY and improving overall program outcomes.

It also gave Local Workforce Development Boards flexibility to enroll those Youth most in need with significant barriers that require supportive services. The utilization of this waiver helps to serve more youth with work-based learning opportunities. The waivers assisted ISY and OSY with limited funding due to yearly WIOA cuts for each program year the waiver was applicable.

Alignment with Department policy priorities

Both waiver requests are consistent with U.S. Department of Labor's policy priorities. The request will aim to address the following below.

1. Focus on ensuring that all eligible youth achieve secondary and postsecondary educational success;
2. Increase eligible youth access to opportunities statewide as it relates to education, training, employment and supportive services and;
3. Align with Workforce Innovation and Opportunity Act's intent by supporting career pathways and the preparation of young people for in-demand occupations.

Individuals, groups or populations affected by the waiver

Louisiana was able to use Waiver #1 to increase collaboration statewide in the following areas listed below.

- Strengthen Collaboration with Career and Technical Education (CTE) Programs - the waiver allowed the ability to offer ITAs to ISY. The local areas established stronger partnerships with CTE programs across the region, which enabled them to provide ISY with access to specialized trainings and certifications that are directly aligned with local labor market needs. The staff actively participated in CTE program events, facilitating workshops and presentations to inform students about available training opportunities and career pathways supported by WIOA.
- Enhanced Engagements with High Schools - the waiver facilitated better cooperation with high schools by demonstrating the commitment to supporting at-risk students. As it relates to the ITA waiver, high schools saw tangible benefits in collaborating with Local Workforce Development Areas (LWDAs) in leading to increased referrals of students who could benefit from vocational training. The local areas worked closely with school counselors and administrators to identify students in need of support and guide them through the WIOA application process.
- Targeted Outreach to At-Risk Students - the waiver enabled local areas to focus on students at risk of dropping out by offering them a clear pathway to training and employment. By collaborating with high school officials, the local areas could identify these students early and provide them with the resources and support needed to stay engaged in their education and prepare for future employment.

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- Increase of In-School Work Experience - the possibility of using an ITA and increasing the dialogue with local K-12 opened the door for collaborations in Work Experience programs for those students who are currently in school.

By implementing these strategic initiatives, the state was able to create a more inclusive and supportive environment for all youth participants by helping them achieve better educational and employment outcomes. The local areas were able to do the following listed below due to the approved waiver.

Balance Funding and Resources: With more balanced funding, local areas can extend services to a larger number of in-school youth (ISY) while continuing to effectively support out-of-school youth (OSY). While working with disengaged youth remains a priority, balancing funding to also assist at-risk youth who are still in school increases the likelihood of transitioning them into post-secondary training or employment. Collaborating jointly with K-12 and higher education institutions—without requiring youth to disengage before receiving youth-funded skills development—is a key benefit of allocating additional funding to ISY. These programs are highly effective in providing work-based learning environments and essential soft skills training for youth.

Build Trust and Cooperation with Education Institutions: Supporting ISY more robustly has helped rebuild trust with school principals and administrators, particularly after the initial loss and subsequent reinstatement of the waiver. Consistent and transparent communication about the waiver’s benefits strengthened relationships with these stakeholders, enhancing the ability to serve at-risk youth. Previously, schools identified students at risk of dropping out, but this waiver enables earlier engagement in vocational, skills-based training before they become disengaged or out-of-school youth. This proactive approach benefits both students and their communities.

Expand Program Offerings and Participation: With additional resources for ISY, local areas have broadened the range of programs and services offered. These include targeted workshops, training sessions, and tailored support services, ultimately increasing enrollment and participation rates. The ability to work directly with Career and Technical Education (CTE) programs and career coaches within schools is transformative. Funding work experience programs for in-school youth allows them to start on the path to employment while completing their education. Workforce entities can now engage youth earlier by focusing on future goals, financial literacy, digital literacy, and other skill areas, empowering them to make well-informed decisions about their futures. Expanded career exploration and work-based programs keep youth engaged, guiding them toward training and high-demand, high-wage careers.

Monitoring Process

Louisiana Workforce Commission along with the Local Workforce Development Boards will jointly assume the responsibility for monitoring impact of the waivers. The monitoring process will be done quarterly. This will be followed up with a discussion during the joint quarterly meeting of

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the Local Workforce Development Boards and Office of Workforce Development immediately after the approval of the waivers.

Public Comment and Notification

The waiver request will be posted on the agency website www.laworks.net, which is publicly accessible with a link to provide and/or accept public comments for a minimum of 30 days. It will be posted from Monday, January 6, 2025 - Wednesday, February 5, 2025. The state will notify all 15 Local Workforce Development Board Directors and other stakeholders of the publication and comment period.

Local Workforce Development Board Directors were provided a copy of the waiver request and given the opportunity to contact the Office of Workforce Development for feedback.

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