

U.S. Department of Labor

Assistant Secretary for
Employment and Training
Washington, D.C. 20210



July 20, 2026

The Honorable David M. Apatang
Governor of the Commonwealth of the Northern Mariana Islands
Juan A. Sablan Memorial Building
Capitol Hill
Saipan, MP 96950

Dear Governor Apatang:

Thank you for your waiver request submission to the U.S. Department of Labor regarding certain statutory and regulatory provisions of the Workforce Innovation and Opportunity Act (WIOA) and the accompanying plan to improve the statewide workforce development system (enclosed). The waiver requests were received April 30, 2026, as part of your recent WIOA State Plan submission.

The Commonwealth of the Northern Mariana Islands (Commonwealth) submitted the following waiver requests:

- Waiver associated with the requirement at WIOA Section 129(a)(4)(A) and 20 CFR 681.410 that the State and local areas expend 75 percent of local formula youth funds on out-of-school youth (OSY); and
- Waiver of 20 CFR 681.550 to allow WIOA individual training accounts (ITAs) for in-school youth (ISY).

This letter is to inform the Commonwealth that these waiver requests are not necessary. As noted in the memo on February 13, 2024, sent to the Commonwealth, "WIOA Adult, Dislocated Worker, and Youth Outlying Area Consolidated Grant" allows outlying areas to use funds interchangeably among programs. Participants may be enrolled in any Adult, Dislocated Worker, or Youth activity. Participants must still meet the eligibility criteria for at least one of the WIOA title I funding streams (Adult, Dislocated Worker, or Youth). As a result of the consolidation, outlying areas are not required to meet the following WIOA requirements for which you requested waivers:

- Waiver associated with the requirement at WIOA Section 129(a)(4)(A) and 20 CFR 681.410 that the State and local areas expend 75 percent of local formula youth funds on out-of-school youth (OSY); and
- Waiver of 20 CFR 681.550 to allow WIOA individual training accounts (ITAs) for in-school youth (ISY).

In addition to these statutory flexibilities, the Consolidated Grant Agreement provides outlying areas with several important administrative and programmatic options designed to support effective implementation of WIOA Title I Adult, Dislocated Worker, and Youth programs. CNMI's approved grant permits the Commonwealth to deploy resources interchangeably across program activities based on local need. This authority supports integrated service delivery, reduces administrative burden, and enables more strategic use of limited resources.

The Consolidated Grant Agreement also permits outlying areas to adopt alternative performance indicators that reflect local labor market conditions and population characteristics; implement simplified one-stop partner arrangements tailored to their geographic and service delivery realities; and utilize streamlined fiscal controls that ensure strong stewardship of federal funds while reducing reporting burden. Together, these flexibilities reinforce Congress's intent to ensure that outlying areas can fully participate in WIOA under conditions that acknowledge their unique governance structures and distinct economic contexts.

ETA remains committed to supporting outlying areas in understanding, evaluating, and making full use of all flexibilities available under the Consolidated Grant Agreement. ETA will continue to provide technical assistance to help the Commonwealth examine these provisions, determine which options best meet the Commonwealth's needs, and implement them effectively and in alignment with statutory and regulatory requirements.

ETA is available to provide technical assistance to you in support of your goals. If you have questions, feel free to contact my office at (202) 693-2772.

Sincerely,

A handwritten signature in blue ink that reads "Henry Mack". The signature is written in a cursive, flowing style.

Henry Mack, Ed.D.
Assistant Secretary

Enclosure

cc: Frances A. Torres, Director, CNMI Department of Labor Workforce Investment Agency
Dr. Tamika Ledbetter, San Francisco Regional Administrator, ETA
Paul Castro-Rodriguez, Federal Project Officer, ETA