U.S. Department of Labor

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

March 9, 2026

The Honorable Ned Lamont
Governor of Connecticut
State Capitol
210 Capitol Avenue
Hartford, CT 06106

Dear Governor Lamont:

Thank you for your waiver request submission to the U.S. Department of Labor (Department) 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 on December 11, 2025. This letter provides the Employment and Training Administration's (ETA) official response to your request and memorializes that Connecticut will meet the outcomes and implement the measures identified in its plan to ensure accountability agreed to by Connecticut and ETA. This action is taken under the Secretary of Labor's authority to waive certain requirements of WIOA Title I, Subtitles A, B, and E, and Sections 8–10 of the Wagner-Peyser Act in WIOA Section 189(i).

Requested Waiver: The State is requesting a waiver of WIOA 134(d)(4) and 20 CFR 680.800(a) to allow local areas to reserve more than 20 percent of Adult and Dislocated Worker funds for incumbent worker training (IWT).

ETA Response: ETA approves the State's waiver request through June 30, 2028, to permit local areas to increase the allowable threshold available for IWT from 20 to 30 percent. ETA reviewed the State's waiver request and plan and has determined that the requirements requested to be waived impede the ability of Connecticut to implement its plan to improve the workforce development system. The following conditions apply to implementation of this waiver:

- IWT may only be used to provide an employee skills to advance in their job or obtain skills to stay in a job (layoff aversion);
- Report individual records based on the Participant Individual Record Layout for all IWT participants through the Workforce Integrated Performance System; and
- Track progress toward achieving the goals established in the waiver request.

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

ETA Response: ETA approves the State's request to waive the requirement limiting ITAs to only out-of-school youth (OSY), ages 16–24. In addition to these OSY, the State may use ITAs for ISY, ages 16–21. ETA reviewed the State's waiver request and plan and has determined that the requirements requested to be waived impede the ability of the State to implement its plan to improve the workforce development system.

Requested Waiver: Waiver of WIOA 116(c) to allow greater flexibility to contract alternative or supplemental performance measures with Workforce Development Boards.

ETA Response: This waiver is not needed. After review of the request and subsequent conversations with the State, ETA understands that Connecticut does not seek to waive any performance accountability requirements under Section 116, but rather to introduce additional measures to improve local area performance management. Therefore, a waiver is not necessary to achieve the goals outlined in the State's request related to eligibility coordination, supplemental performance accountability measures, and contract oversight.

The State must report its waiver outcomes and implementation of the approved waivers in the WIOA Annual Report. ETA will use this information to assess continued waiver approval and to identify promising practices that may be adopted more widely. 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,

Henry Mack, Ed.D.
Assistant Secretary

Enclosures

cc: Stephen Dombrowski, Director, Connecticut Department of Labor
Erica Tew, Director, WIOA Administration
Danielle Worthen Ramos, Acting Boston Regional Administrator, ETA
Phoebe Reeves, Federal Project Officer, ETA

State of Connecticut WIOA Waiver Requests

Waiver Request 1 - 20 CFR 680.800(a)

1. **Statutory and/or regulatory requirements the state would like to waive:**

   The state requests a waiver of 20 CFR 680.800(a), which limits local areas to reserving up to 20% of their combined Adult and Dislocated Worker allocations for incumbent worker training. The waiver would allow the local workforce development areas to reserve more than 20% of funds for incumbent worker training when strategically aligned with state workforce priorities and employer engagement initiatives.

2. **Actions the state has undertaken to remove state or local barriers:**

   Action 1: Conducted Statewide Outreach and Technical Assistance
   Connecticut has conducted statewide outreach and provided technical assistance to local Workforce Development Boards (WDBs) to help identify high-demand sectors and the specific workforce needs of employers. This work is coordinated through the Office of Research and quarterly planning sessions that ensure employer services remain competitive amid shifting funding and labor market dynamics.

   To guide these efforts, Connecticut reviewed recent national publications, *America's Talent Strategy: Building the Workforce for the Golden Age* and *Winning the Race: America's AI Action Plan*, to inform its approach to emerging technologies, artificial intelligence, and the evolving skills landscape. Insights from these analyses have been incorporated into technical assistance and planning discussions, helping WDBs align training priorities with national and global workforce trends.

   Action 2: Provided Guidance on Aligning WIOA Funds with Employer-Driven Strategies
   The state has provided targeted guidance and technical support to ensure that local areas align WIOA investments with employer-driven strategies and regional workforce needs. This includes helping WDBs strengthen industry partnerships, design responsive training opportunities, and braid funding sources to maximize impact.

   As a result, WDBs have planned for and began implementing innovative and sustainable training models that respond quickly to employer needs, reduce duplication, and expand access to in-demand credentials.

   Action 3: Expanded Access to No-Cost, Industry-Aligned Training Programs
   WDBs launched innovative training programs directly aligned with industry demand.

   - The Eastern CT Manufacturing Pipeline Initiative (MPI) offers free, short-term training in trades such as welding, machining, and shipfitting, paired with supportive services like stipends, childcare, and job placement assistance that connect unemployed and underemployed residents to manufacturing careers with employers such as Electric Boat.
   - The METAL (Master Electroplating Through Applied Learning) program, the nation's first workforce training curriculum in metal finishing, provides hands-on, NIMS-aligned instruction through the Manufacturing Alliance Service Corporation (MASC), supported by state bond funding and employer partnerships.

   These programs have become recognized models for employer-driven, accessible training that expand opportunity, reduce barriers for participants, and strengthen Connecticut's manufacturing workforce.

Action 4: Reviewed Funding Barriers and Expanded Local Flexibility
Connecticut has reviewed prior fund allocations and identified barriers that limited local flexibility in investing in IWT and related upskilling strategies. Employers and industry partners were engaged throughout this process in order to find ways to better support their hiring and training needs. These needs were identified in convenings led by the WDBs and their Regional Sector Partnerships (RSPs), helping to design scalable programs that respond to changing workforce needs.

This waiver would continue to support and expand these innovations, ensuring that local areas can invest flexibly and effectively in programs that meet the evolving needs of both workers and businesses.

3. **Description of the state's strategic goal(s):**

Connecticut aims to increase employer participation in workforce development programs by providing flexible funding for incumbent worker training, building upon existing effective models while adding the flexibility of formula funding to sustain these efforts. The state seeks to support high-demand industry sectors through targeted skill development that addresses both current and projected workforce needs in manufacturing, construction, the skilled trades, and other growth sectors.

Connecticut has identified bottlenecks as points where production or service delivery is slowed due to shortages of skilled workers in critical roles, such as machinists, welders, CDL drivers, and IT support technicians. These gaps limit employer productivity, innovation, and the ability to expand operations. To alleviate these bottlenecks, the state is increasing access to industry-recognized credentials such as NIMS machining, OSHA 30, CDL Class B, and CompTIA IT certifications.

By aligning training opportunities with employer standards and credential requirements, Connecticut is creating clear advancement pathways for workers that improve retention and mobility. When workers gain skills valued by their employers and can see progression from entry-level to higher-skill positions within their industry, they are more likely to remain employed and pursue continued advancement. This alignment also strengthens the connection between workforce development and local economic growth by expanding access to tailored, employer-responsive training programs that meet both business and worker needs.

4. **Quantifiable projected programmatic outcomes resulting from implementation of the waiver:**

Connecticut projects an increase in incumbent worker training participants from approximately 12 annually to at least 88, statewide, within the first year of waiver implementation. By year two, the goal is to engage 50 employers in outreach activities and train 200 workers annually across manufacturing, healthcare, construction, and IT. Building on models such as the MPI (4,700 trained with a 93% placement rate) and METAL, we anticipate credential attainment rates of 65% in year one and 75% by year two. In addition to credentials and skill gains, waiver outcomes will include employer retention and sustained engagement identified through surveys and feedback mechanisms.

Projected Outcomes Under the Waiver

Metric	Year 1	Year 2	Notes
Incumbent Worker Training Participants	≥ 88 workers	200 workers	RSP Employers have currently identified potential workers.

Participating Employers	25 employers	50 employers	Projected statewide increase supported by flexible funding under the waiver.
Credential Attainment Rate for IWTs	65%	75%	Based on models such as MPI (4,700 trained, 93% placement) and METAL.
Employer Retention / Engagement	Establish baseline survey	≥ 80% repeat engagement rate	Measured through surveys and local feedback mechanisms

Note: No baseline data for contrast as IWT service is limited.

5. **Individuals, groups, or populations benefitting from the waiver:**

- Incumbent workers seeking skill upgrades to remain competitive in high-demand industries.
- Employers who need a skilled workforce to maintain or expand operations.
- Local WDBs gaining flexibility to allocate funds efficiently.
- Adults and dislocated workers at risk of job displacement who can benefit from upskilling opportunities.
- Training providers and educational institutions partnering with employers and WDBs to design and deliver responsive, industry-aligned programs.

6. **How the state plans to monitor waiver implementation:**

- Collect data on fund allocation, training enrollments, employer participation, credential attainment, and skill gains through the state's WIOA management information system (MIS) and external reports provided by participating employers as needed.
- Designate a local WDB staff member as the point of contact (POC) for each participating employer. The POC will coordinate data submission, verify information received, and provide technical assistance to ensure timely and accurate reporting.
- Conduct quarterly reviews of local area expenditure reports and performance metrics, including documentation shared through regional 9130s and other fiscal reporting mechanisms.
- Require WDBs to submit progress reports on training outcomes for each participating employer and worker cohort as part of waiver implementation. Although some participants may not be enrolled in WIOA Title I services, data collection responsibilities will be clearly defined through the WDB-employer agreement, with the goal of achieving consistent quarterly reporting.
- Verify data integrity through cross-checks between the MIS, employer-submitted documentation, and fiscal records. State-level staff will review discrepancies, provide follow-up guidance, and, if necessary, request corrections or supporting documentation from the local WDBs.
- Evaluate waiver impact on employer engagement, worker retention, and alignment with targeted industry needs through interviews, group calls, and feedback sessions with key stakeholders. The evaluation process, including frequency, format, and tools, will be developed collaboratively with participating employers to promote engagement and ensure that findings are meaningful and actionable.

7. **Assurance of state posting of the request for public comment and notification to affected local workforce development boards:**

The waiver request will be posted on the state's workforce agency website from November 20, 2025, through December 3, 2025, to allow for public comment. All affected WDBs will be notified via official correspondence and provided an opportunity to submit feedback during this period.

Comments received by December 3, 2025 will be reviewed, summarized, and addressed prior to submission of the final waiver request to the U.S. Department of Labor. A summary of comments and responses will be included as part of the submission package.

Waiver Request 2 - 20 CFR §681.550

1. **Statutory and/or regulatory requirements the state would like to waive:**

   CTDOL is seeking a waiver of WIOA regulatory requirements under 20 CFR §681.550, which limits the use of individual training accounts (ITAs) for youth participants to out-of-school youth (OSY) ages 16 to 24. CTDOL is seeking a waiver of this rule to extend the use of ITAs to in-school youth (ISY).

2. **Actions the state has undertaken to remove state or local barriers:**

   There are no state or local barriers that would impede implementation of the requested waiver.

3. **Description of the state's strategic goal(s):**

   This request is for a statewide waiver to grant ISY, ages 16-21, the same participant options that OSY have by allowing workforce area staff to use ITAs, when appropriate, to provide ISY with education and training.

   Boards view this waiver as an opportunity to promote career and technical education programs that result in industry recognized credentials, with a focus on expanding access to dual-credit offerings in high school settings. It will also help ISY living in rural workforce areas overcome the unique economic and employment challenges facing them. Allowing ISY to access ITAs will assist WDBs in co-enrolling participants across multiple grant programs to braid funds, streamline services, and provide the greatest flexibility in helping youth make informed career choices.

   CTDOL specifically seeks to allow co-enrolled youth in WIOA Title I youth programming and its Office of Disability Employment Policy Employment Transition Model (ODEP ETM) grant to access the Eligible Training Provider List (ETPL).

   Youth participants have expressed strong interest in entrepreneurial and self-employment pathways, offered under some programming such as Real Estate licensure programs that are currently listed on the ETPL. Through staff guidance and career exploration, youth are also introduced to a broader range of in-demand, employer-aligned training programs available through the ETPL, including manufacturing (e.g., CNC machining, welding, quality inspection), healthcare (e.g., certified nursing assistant, phlebotomy, patient care technician), information technology (e.g., CompTIA A+, cybersecurity, network support), and construction (e.g., OSHA 30) tracks.

   Employer input gathered through local WDB business service teams confirms that advanced manufacturing, healthcare, and IT occupations continue to face persistent skill shortages and high turnover. Employers in these industries have expressed support for expanding early access to training and credential pathways for youth, particularly those that align with local career and technical education programs or pre-apprenticeship models. This alignment ensures that ISY participants are gaining relevant skills while employers benefit from a more prepared and stable entry-level pipeline.

Once a youth enrolls in a WIOA program as an ISY, they maintain ISY status until exit. Excluding ISY from receiving ITAs could undermine WIOA's goals to expand program options, increase flexibility, and enhance customer choice. DOL guidance clarifies that ISY age 18 or older may access ITAs through the adult program; however, this does not help younger ISY or those who disengage from school before completion. Youth caught in this gap are at risk of leaving the workforce system entirely without achieving the education, training, and certifications necessary for economic self-sufficiency.

This waiver would allow WDBs to provide ITAs for certain ISY, giving staff the flexibility to use youth formula funds to meet the individual training and employment needs of at-risk youth without administrative delays. Without this option, WDNs must often contract with schools for single-individual enrollments, a time consuming process that can cause missed training cycles and lost engagement.

Approval of this waiver request would allow CTDOL to meet the following state goals:

- Increase ISYs' access to educational and training programs: Providing Boards with the flexibility to use ITAs for ISY will increase the number of available workforce opportunities and help youth pursue education and training that lead to meaningful work and economic self-sufficiency.
- Decrease delays in service delivery: By allowing the use of statewide ETPL programs for all youth, Boards can connect students to available training without waiting for lengthy procurement processes.
- Strengthen employer partnerships: By integrating employer-identified skill needs and feedback into training design, local areas will expand opportunities in priority sectors such as manufacturing, healthcare, construction, and IT, while maintaining pathways for entrepreneurship and self employment.

4. Quantifiable projected programmatic outcomes resulting from implementation of the waiver:

CTDOL projects the following statewide programmatic outcomes across all five WDBs resulting from implementation of this waiver:

Projected Outcome	Waiver Target	Current Baseline (Regular WIOA Youth Program)
Percentage of in-school youth participating in occupational training who have ITAs	10%	0% (ISY currently ineligible for ITAs)
Percentage of ISY enrolled in ITA-funded training who earn a credential	70%	0% (ISY currently ineligible for ITAs)* *PY23 Pre-Adjusted Reports on USDOL Dashboard show all Youth Credential not yet available.
Percentage of ISY who achieve measurable skill gains	80%	PY23 Pre-Adjusted Reports on USDOL Dashboard show all Youth MSG at 76.1%

These projections reflect modest improvements, but generally focus on expanding access to training statewide. The projections in MSG reflect that ISY may face different engagement patterns and timeframes than OSY participants. Our goal in these outcomes are also to strengthen employer pipelines and training access in in-demand industries, including healthcare, manufacturing, IT, and entrepreneurship-related fields, by aligning offerings with youth interests and regional employer demand.

5. **Individuals, groups, or populations benefitting from the waiver:**

ISY who drop out of school or who are at risk of dropping out would benefit from this waiver as it provides an opportunity to strengthen connections to both education and work. ISY co-enrolled in the ODEP ETM grant would also see expanded training options and clearer navigation pathways under this waiver.
This partnership will strengthen administration and coordination across Title I Adult and Youth programs, Vocational Rehabilitation and Pre-Employment Transition Services, Regional Education Service Centers, and local education agencies by addressing several logistical barriers identified through prior joint work. Specifically, the waiver will allow partners to:

- **Improve information sharing** on Eligible Training Provider List (ETPL) offerings, including program start dates, application windows, and approval status (e.g., approved vs. pending renewal), so youth and referring partners can plan appropriately.
- **Clarify and communicate program prerequisites and eligibility requirements** to reduce delays in enrollment and ensure that youth are referred to training opportunities they can realistically access.
- **Enhance cross-program planning and referrals** through regular coordination meetings and shared data on youth enrollment progress, credential attainment, and program outcomes.
- **Strengthen understanding of WIOA program requirements** among education and state partners who may be unfamiliar with workforce eligibility and compliance needs, ensuring referrals are timely, accurate, and appropriately documented.
- **Support continuous improvement and administrative efficiency** by identifying systemic bottlenecks, such as duplicate documentation requests, differing assessment timelines, or overlapping outreach efforts, and creating shared solutions across programs.

Together, these actions will reduce administrative fragmentation, improve service delivery timelines, and create a more seamless experience for youth participants while ensuring that all partners have the operational insight necessary to coordinate effectively.

6. **How the state plans to monitor waiver implementation:**

Upon USDOL's approval of this waiver request, CTDOL will communicate the waiver allowance to WDBs and workforce system partner programs. CTDOL will monitor progress under this waiver by reviewing monthly performance reports that are submitted by WDBs, through regularly scheduled conference calls with WDB executive directors, and through the agency's monitoring and performance accountability system. CTDOL will report waiver outcomes in the state's WIOA Annual Report. If the state requests renewal of this waiver, CTDOL will provide the most recent outcomes data available.

7. **Assurance of state posting of the request for public comment and notification to affected local workforce development boards:**

The waiver request will be posted on the state's workforce agency website from November 20, 2025, through December 3, 2025, to allow for public comment. All affected local Workforce Development Boards will be notified via official correspondence and provided an opportunity to submit feedback during this period.

Comments received by December 3, 2025 will be reviewed, summarized, and addressed prior to submission of the final waiver request to the U.S. Department of Labor. A summary of comments and responses will be included as part of the submission package.

Waiver Request 3 - WIOA §116(c)

1. **Statutory and/or regulatory requirements the state would like to waive:**

   WIOA §116(c) requires state and local performance accountability systems to use the same set of indicators of performance described in §116(b)(2)(A).

   CTDOL requests a waiver from WIOA §116(c) to allow greater flexibility when contracting performance measures with WDBs.

2. **Actions the state has undertaken to remove state or local barriers:**

   There are no state or local barriers that would impede implementation of the requested waiver.

3. **Description of the state's strategic goal(s):**

   CTDOL aims to maximize co-enrollment across WIOA programs and this waiver from WIOA §116(c) would allow greater flexibility when contracting performance measures with WDBs. This flexibility would allow the state to promote service integration across Titles I-IV and remove administrative barriers that limit ISY population engagement, particularly those engaged in secondary transition programs under their Individualized Education Programs (IEPs).

   Under WIOA §129(a)(4)(A), a minimum of 75% of all Youth funds (statewide and local) must be spent on Out-of-School Youth (OSY). The remaining 25% may support In-School Youth (ISY). Because of this statutory funding priority and performance measurement rules, Connecticut faces challenges in serving some youth who are technically enrolled in school but are participating in transition programs preparing them for employment or postsecondary education.

   For youth in transition programs under their IEP, particularly those co-enrolled in Connecticut's Office of Disability Employment Policy Employment Transition Model (ODEP ETM) grant eligibility as ISY or OSY can vary depending on how "school participation" is defined by the local education district.

   - In some districts, youth attending community-based transition programs are considered enrolled (ISY).
   - In others, these same students are considered to have completed their secondary education (OSY).

   CTDOL recognizes this variance in classification may result in uneven access to services. Therefore, where possible and consistent with WIOA definitions, CTDOL and WDBs will identify youth participating in transition programs as OSY to enable flexible funding and avoid the restrictive performance implications applied to ISY participants.

To ensure there will not be administrative limitations tied to performance that prevent access to services, we are also pursuing this waiver due to the Special Rule for ISY on Credentials Attainment Indicators. Under WIOA §116(b)(2)(A)(iii), the Credential Attainment Indicator includes a *Special Rule* for participants who obtain a secondary school diploma or equivalent.
To count as a positive outcome, the individual must also be employed or enrolled in an education or training program leading to a recognized postsecondary credential within one year of exit.
Because ISY are automatically included in the credential attainment measure pool, this rule creates timing barriers:

- Many ISY participants remain enrolled in school after program participation, delaying their ability to meet the post-exit employment or education condition.
- WDBs must weigh the administrative and performance risks of serving these youth, as outcomes may appear negative due to timing rather than true program impact.
  These factors, combined with the 75% OSY expenditure requirement, reduce incentives to enroll ISY- even when early engagement and coordinated transition services could yield strong, long-term outcomes.

4. Quantifiable projected programmatic outcomes resulting from implementation of the waiver:

This waiver will provide CTDOL with flexibility to contract alternative or supplemental performance measures with local WDBs that better reflect progress for ISY and transitional youth, while maintaining accountability and federal reporting requirements. CTDOL anticipates outcomes tied to measure development, eligibility coordination, contract oversight, and cross-agency coordination detailed below.

To measure development, CTDOL's WIOA Administration and Performance and Accountability Units will collaborate with WDBs to design alternative indicators for ISY and transitional youth. These may include pre-credential milestones such as work-based learning hours completed, training enrollment, or completion of transition goals tied to IEPs. Boards may also pilot "transition outcome measures" that track successful handoffs between secondary, postsecondary, and workforce programs.

For eligibility coordination, where possible, WDBs will classify eligible transition youth as OSY under federal definitions, consistent with local education agency determinations of school participation. This will ensure the youth can access WIOA-funded services without being affected by the Special Rule or ISY funding limits. CTDOL will issue guidance clarifying acceptable documentation and verification procedures for OSY classification among transition program participants.

For contract oversight, CTDOL will incorporate these locally-relevant measures into annual WDB performance contracts, especially those where ODEP and WIOA co-enrollment will be an expected occurence. Contracts will include clear definitions, data sources (e.g., CTHires, the state MIS, educational partner data), and target levels for each indicator. CTDOL will conduct quarterly data reviews and provide performance and compliance assistance to WDBs where formally contracted measures are not met.

For cross-agency coordination, CTDOL will coordinate with legal teams to identify viable options for data sharing between workforce, education, and vocational rehabilitation partners to improve real-time tracking of student transitions, credential enrollment, and employment outcomes where consent is explicitly obtained by applicable parties and access to information is limited to the scope of the measures defined. This coordination will help ensure that both ISY and OSY youth experience continuous service without unnecessary program exits or re-enrollments.

5. **Individuals, groups, or populations benefitting from the waiver:**

Approval of this waiver would directly benefit ISY, particularly students with disabilities and those participating in transition programs under IEPs, as well as OSY, and WDBs that administer services. Specifically, the waiver would:

- Expand access to training and credential programs for youth in transition programs, regardless of whether they are classified by their district as ISY or OSY;
- Encourage earlier engagement of ISY in career pathways through work-based learning, pre-apprenticeships, and dual enrollment opportunities that better connect education and employment;
- Support streamlined performance measurement by addressing the timing challenges of the WIOA Credential Attainment Special Rule, which currently limits the ability to fully recognize ISY outcomes within the performance period;
- Reduce administrative and eligibility confusion stemming from district-level differences in defining school participation status, promoting consistent classification and coordination across workforce and education partners; and
- Maintain accountability and performance transparency through contracted, validated indicators and quarterly oversight that ensure data integrity and continued alignment with WIOA requirements.

This waiver also aligns with USDOL's policy priorities by:

- Expanding education and training access for youth with barriers to employment, including those with disabilities and those at risk of disconnection;
- Strengthening coordination and service integration among WIOA Titles I (Youth), II (Adult Education), and IV (Vocational Rehabilitation), as well as local education agencies; and
- Promoting earlier workforce exposure and transition from secondary education to postsecondary and career opportunities.

In sum, this waiver allows CTDOL and its partners to reach youth earlier, measure success, and reduce administrative barriers that limit participation in meaningful, career-connected learning opportunities.

6. **How the state plans to monitor waiver implementation:**

Upon DOL's approval of this waiver request, CTDOL will communicate the waiver allowance to Boards and workforce system partner programs. CTDOL will monitor progress under this waiver by reviewing monthly performance reports submitted by the Boards, conducting regularly scheduled conference calls with Board executive directors, and utilizing the agency's monitoring and performance accountability system. Importantly, all waiver outcomes will be formally documented and reported in the state's WIOA Annual Report, ensuring transparency, accountability, and the availability of data for federal review. If the state requests renewal of this waiver, CTDOL will provide the most recent outcomes data available, as reflected in the WIOA Annual Report.

7. **Assurance of state posting of the request for public comment and notification to affected local workforce development boards:**

The waiver request will be posted on the state's workforce agency website from November 20, 2025, through December 3, 2025, to allow for public comment. All affected WDBs will be notified via official correspondence and provided an opportunity to submit feedback during this period.

Comments received by December 3, 2025 will be reviewed, summarized, and addressed prior to submission of the final waiver request to USDOL. A summary of comments and responses will be included as part of the submission package.

Additional Information:

Good afternoon,

The Governance team received the following waivers embedded in Connecticut's 2026-2027 WIOA State Plan Modification.

1. **Statutory and/or regulatory requirements the state would like to waive:**
   The state requests a waiver of 20 CFR 680.800(a), which limits local areas to reserving up to 20% of their combined Adult and Dislocated Worker allocations for incumbent worker training. The waiver would allow the local workforce development areas to reserve more than 20% of funds for incumbent worker training when strategically aligned with state workforce priorities and employer engagement initiatives.
2. **Statutory and/or regulatory requirements the state would like to waive:**
   CTDOL is seeking a waiver of the requirement under WIOA rule at 20 CFR §681.550, which limits the use of individual training accounts (ITAs) for youth participants to out-of-school youth (OSY) ages 16 to 24. CTDOL is seeking a waiver of this rule to extend the use of ITAs to in-school youth (ISY).
3. **Statutory and/or regulatory requirements the state would like to waive:**

WIOA §116(c) requires state and local performance accountability systems to use the same set of indicators of performance described in §116(b)(2)(A).

Please provide any comments or feedback on or before EOB – **Friday, March 13, 2026**.

Attached are the following documents for your review and comment.

- Copy of the Waiver Requests
- Waiver Guide

We can meet to discuss and deliberate on the waiver requests received.

Let me know if you have any additional questions.

Best,

-Sonoi

Robert Sonoi Omwenga
National Office Waiver Point of Contact – REGION 1
Employment and Training Administration
Office of Workforce Investment (OWI)
Division of Adult Services and Governance (DASG)
United States Department of Labor
Phone: (202) 693-4378

From: Wioa, Plan - ETA <wioa.plan@DOL.gov>
Sent: Tuesday, March 10, 2026 9:23 AM

To: Fox, Sean - ETA <Fox.Sean@dol.gov>; Hastings, Sara - ETA <Hastings.Sara@dol.gov>
Cc: Antiri, Crystal - ETA <Antiri.Crystal@dol.gov>; Omwenga, Robert (Sonoi) - ETA <Omwenga.Robert.S@dol.gov>; Harrell, Harlan C - ETA <harrell.Harlan.C@dol.gov>; Wioa, Plan - ETA <wioa.plan@DOL.gov>
Subject: RE: Signed CT Waiver Response Letter and Incoming Request

Hello Sean and Sara:

FYI below. The Connecticut waiver letter has been sent to the State.

Thanks,
Cheryl

From: Reeves, Phoebe - ETA <Reeves.Phoebe@dol.gov>
Sent: Tuesday, March 10, 2026 9:16 AM
To: Bartolomeo, Dante <dante.bartolomeo@ct.gov>; Mark Polzella <mark.polzella@ct.gov>; Tew, Erica <erica.tew@ct.gov>
Cc: Wioa, Plan - ETA <wioa.plan@DOL.gov>; Banimenia, Kate - ETA <Banimenia.Kathleen@dol.gov>; Poirier, Amanda - ETA <poirier.amanda@dol.gov>; Worthen Ramos, Danielle - ETA <WorthenRamosDanielle@dol.gov>; Reeves, Phoebe - ETA <Reeves.Phoebe@dol.gov>
Subject: Signed CT Waiver Response Letter and Incoming Request

Good morning, Dante, Mark, and Erica,

Attached please find CT's signed Waiver Response Letter and Incoming Request.

Please let us know if you have any questions.

Thank you so much,

Phoebe

Phoebe Reeves
Workforce Development Specialist
U.S. Department of Labor – ETA
JFK Federal Bldg., Room E-350
Boston, MA 02203
617-788-0127

From: Reeves, Phoebe - ETA <Reeves.Phoebe@dol.gov>
Sent: Wednesday, March 11, 2026 11:44 AM
To: Fox, Sean - ETA <Fox.Sean@dol.gov>
Cc: Omwenga, Robert (Sonoi) - ETA <Omwenga.Robert.S@dol.gov>; Antiri, Crystal - ETA <Antiri.Crystal@dol.gov>; Poirier, Amanda - ETA <poirier.amanda@dol.gov>; Rosenberg, Evan - ETA <Rosenberg.Evan@dol.gov>; Hastings, Sara - ETA <Hastings.Sara@dol.gov>
Subject: RE: 2026-2027 Connecticut WIOA State Plan Modification Waiver Requests

Thank you so much, all!

Phoebe

Phoebe Reeves
Workforce Development Specialist
U.S. Department of Labor – ETA
JFK Federal Bldg., Room E-350
Boston, MA 02203
617-788-0127

From: Fox, Sean - ETA <Fox.Sean@dol.gov>
Sent: Wednesday, March 11, 2026 10:50 AM
To: Reeves, Phoebe - ETA <Reeves.Phoebe@dol.gov>
Cc: Omwenga, Robert (Sonoi) - ETA <Omwenga.Robert.S@dol.gov>; Antiri, Crystal - ETA <Antiri.Crystal@dol.gov>; Poirier, Amanda - ETA <poirier.amanda@dol.gov>; Rosenberg, Evan - ETA <Rosenberg.Evan@dol.gov>; Hastings, Sara - ETA <Hastings.Sara@dol.gov>
Subject: RE: 2026-2027 Connecticut WIOA State Plan Modification Waiver Requests

Hi Phoebe,

Thank you for being so proactive in your offer to reach out to the state. We really appreciate it! In terms of next steps, as national office waiver lead, Sonoi will collect our comments and determine if there is a need to schedule a call to discuss the waiver. Once we have our ducks in a row, we can go back to the state to request additional information as necessary.

Best,
Sean

From: Reeves, Phoebe - ETA <Reeves.Phoebe@dol.gov>
Sent: Wednesday, March 11, 2026 10:22 AM
To: Fox, Sean - ETA <Fox.Sean@dol.gov>
Subject: RE: 2026-2027 Connecticut WIOA State Plan Modification Waiver Requests

Hi Sean,

I would be happy to reach out to the State to get the details on the below highlighted points. Please advise if you would like me to do so and share with this group.

Additionally, it is possible that the reason for the State and Local waiver is because only two of the locals out of the five locals in CT were part of that initial waiver. The State meets with the locals regularly to track these waivers' progress as part of their quarterly monitoring.

I would also be happy to check on the specifics around State vs. Local only.

Let me know.

Thanks so much,

Phoebe

Phoebe Reeves
Workforce Development Specialist
U.S. Department of Labor – ETA
JFK Federal Bldg., Room E-350
Boston, MA 02203
617-788-0127

From: Fox, Sean - ETA <Fox.Sean@dol.gov>
Sent: Wednesday, March 11, 2026 10:01 AM
To: Omwenga, Robert (Sonoi) - ETA <Omwenga.Robert.S@dol.gov>; Rosenberg, Evan - ETA <Rosenberg.Evan@dol.gov>; Fleck, Heather - ETA <fleck.heather@dol.gov>; Grode, Kellen M - ETA <Grode.Kellen.M@dol.gov>; Poirier, Amanda - ETA <poirier.amanda@dol.gov>; Reeves, Phoebe - ETA <Reeves.Phoebe@dol.gov>; ETAperforms <ETAperforms@dol.gov>
Cc: Antiri, Crystal - ETA <Antiri.Crystal@dol.gov>
Subject: RE: 2026-2027 Connecticut WIOA State Plan Modification Waiver Requests

Good morning all,

Confirming for all that we have signature on Connecticut's waiver letter. This letter covers the 20 percent IWT cap, Youth ITAs, and supplemental local performance measures (not needed) waivers that also came in with the State Plan. As a reminder, we will continue to track and respond to these waivers in Governor's letters, but there is no need to review them again.

I defer to Evan, but regarding the **75 Percent OSY Expenditure for Local Funds Only** waiver, I have two substantive issues and a minor point of order. First, this is a renewal so the State should be able to report on its progress from the past two years of implementation. Instead, this is a copy and paste of the 2024 request. Second, the public comment section of this waiver is different than the three previously addressed waivers. Those three have a very clear public comment period. The OSY waiver lacks a clear comment period so we should confirm that the State did its due diligence with this one. Finally, while not an actual issue with the request, I noticed that ETA previously approved Connecticut for a state and local OSY waiver in 2024 when the State (then and now) only requested local only. Let's make sure we respond with a local only letter in 2026.

Best,
Sean

From: Omwenga, Robert (Sonoi) - ETA <Omwenga.Robert.S@dol.gov>
Sent: Friday, March 6, 2026 1:21 PM
To: Rosenberg, Evan - ETA <Rosenberg.Evan@dol.gov>; Fleck, Heather - ETA <fleck.heather@dol.gov>; Grode, Kellen M - ETA <Grode.Kellen.M@dol.gov>; Poirier, Amanda - ETA <poirier.amanda@dol.gov>; Reeves, Phoebe - ETA <Reeves.Phoebe@dol.gov>; ETAperforms <ETAperforms@dol.gov>
Cc: Antiri, Crystal - ETA <Antiri.Crystal@dol.gov>; Fox, Sean - ETA <Fox.Sean@dol.gov>
Subject: RE: 2026-2027 Connecticut WIOA State Plan Modification Waiver Requests

Colleagues,

I wanted to let you know that we will be pausing the review of the Connecticut waiver requests for youth ITAs, incumbent worker training, and performance measures. To ensure everything is handled appropriately, we should wait until Connecticut receives approval for their previously submitted waivers before moving forward with these new requests.

Please feel free to reach out if you have any questions or need further clarification.

-Sonoi

Robert Sonoi Omwenga
Employment and Training Administration
Office of Workforce Investment (OWI)
Division of Adult Services and Governance (DASG)
United States Department of Labor
Phone: (202) 693-4378

From: Omwenga, Robert (Sonoi) - ETA
Sent: Friday, March 6, 2026 7:12 AM
To: Rosenberg, Evan - ETA <Rosenberg.Evan@dol.gov>; Fleck, Heather - ETA <fleck.heather@dol.gov>; Grode, Kellen M - ETA <Grode.Kellen.M@dol.gov>; Poirier, Amanda - ETA <poirier.amanda@dol.gov>; Reeves, Phoebe - ETA <Reeves.Phoebe@dol.gov>; ETAperforms <ETAperforms@dol.gov>
Cc: Antiri, Crystal - ETA <Antiri.Crystal@dol.gov>; Fox, Sean - ETA <Fox.Sean@dol.gov>
Subject: 2026-2027 Connecticut WIOA State Plan Modification Waiver Requests

Good morning,

The Governance team received the following waivers embedded in Connecticut's 2026-2027 WIOA State Plan Modification.

4. **Statutory and/or regulatory requirements the state would like to waive:**
   The state requests a waiver of 20 CFR 680.800(a), which limits local areas to reserving up to 20% of their combined Adult and Dislocated Worker allocations for incumbent worker training. The waiver would allow the local workforce development areas to reserve more than 20% of funds for incumbent worker training when strategically aligned with state workforce priorities and employer engagement initiatives.
5. **Statutory and/or regulatory requirements the state would like to waive:**
   CTDOL is seeking a waiver of the requirement under WIOA rule at 20 CFR §681.550, which limits the use of individual training accounts (ITAs) for youth participants to out-of-school youth (OSY) ages 16 to 24. CTDOL is seeking a waiver of this rule to extend the use of ITAs to in-school youth (ISY).
6. **Statutory and/or regulatory requirements the state would like to waive:**

WIOA §116(c) requires state and local performance accountability systems to use the same set of indicators of performance described in §116(b)(2)(A).

Please provide any comments or feedback on or before EOB – **Friday, March 13, 2026**.

Attached are the following documents for your review and comment.

- Copy of the Waiver Requests

- Waiver Guide

We can meet to discuss and deliberate the waiver requests received.

Let me know if you have any additional questions.

Best,

-Sonoi

Robert Sonoi Omwenga
National Office Waiver Point of Contact – REGION 1
Employment and Training Administration
Office of Workforce Investment (OWI)
Division of Adult Services and Governance (DASG)
United States Department of Labor
Phone: (202) 693-4378

From: Rosenberg, Evan - ETA <Rosenberg.Evan@dol.gov>
Sent: Monday, March 23, 2026 6:00 PM
To: Fox, Sean - ETA <Fox.Sean@dol.gov>; Omwenga, Robert (Sonoi) - ETA <Omwenga.Robert.S@dol.gov>; Poirier, Amanda - ETA <poirier.amanda@dol.gov>; Reeves, Phoebe - ETA <Reeves.Phoebe@dol.gov>
Cc: Antiri, Crystal - ETA <Antiri.Crystal@dol.gov>
Subject: RE: 2026-2027 Connecticut WIOA State Plan Modification Waiver Requests

I reviewed the CT OSY expenditure waiver and agree that they need to update this waiver for PY 2026 and 2027 if they are indeed asking for a renewal of this waiver. Their request appears to be a cut and paste from their PY ’24 waiver request. In addition, they should provide updated projected programmatic outcomes for this waiver as well as provide progress against the previous projected programmatic outcomes. Thanks.

Evan

From: Fox, Sean - ETA <Fox.Sean@dol.gov>
Sent: Wednesday, March 11, 2026 10:01 AM
To: Omwenga, Robert (Sonoi) - ETA <Omwenga.Robert.S@dol.gov>; Rosenberg, Evan - ETA <Rosenberg.Evan@dol.gov>; Fleck, Heather - ETA <fleck.heather@dol.gov>; Grode, Kellen M - ETA <Grode.Kellen.M@dol.gov>; Poirier, Amanda - ETA <poirier.amanda@dol.gov>; Reeves, Phoebe - ETA <Reeves.Phoebe@dol.gov>; ETAperforms <ETAperforms@dol.gov>
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Subject: RE: 2026-2027 Connecticut WIOA State Plan Modification Waiver Requests

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Best,
Sean

From: Omwenga, Robert (Sonoi) - ETA <Omwenga.Robert.S@dol.gov>
Sent: Friday, March 6, 2026 1:21 PM
To: Rosenberg, Evan - ETA <Rosenberg.Evan@dol.gov>; Fleck, Heather - ETA <fleck.heather@dol.gov>; Grode, Kellen M - ETA <Grode.Kellen.M@dol.gov>; Poirier, Amanda - ETA <poirier.amanda@dol.gov>; Reeves, Phoebe - ETA <Reeves.Phoebe@dol.gov>; ETAperforms <ETAperforms@dol.gov>
Cc: Antiri, Crystal - ETA <Antiri.Crystal@dol.gov>; Fox, Sean - ETA <Fox.Sean@dol.gov>
Subject: RE: 2026-2027 Connecticut WIOA State Plan Modification Waiver Requests

Colleagues,

I wanted to let you know that we will be pausing the review of the Connecticut waiver requests for youth ITAs, incumbent worker training, and performance measures. To ensure everything is handled appropriately, we should wait until Connecticut receives approval for their previously submitted waivers before moving forward with these new requests.

Please feel free to reach out if you have any questions or need further clarification.

-Sonoi

Robert Sonoi Omwenga
Employment and Training Administration
Office of Workforce Investment (OWI)
Division of Adult Services and Governance (DASG)
United States Department of Labor
Phone: (202) 693-4378

From: Omwenga, Robert (Sonoi) - ETA
Sent: Friday, March 6, 2026 7:12 AM
To: Rosenberg, Evan - ETA <Rosenberg.Evan@dol.gov>; Fleck, Heather - ETA <fleck.heather@dol.gov>; Grode, Kellen M - ETA <Grode.Kellen.M@dol.gov>; Poirier, Amanda - ETA <poirier.amanda@dol.gov>; Reeves, Phoebe - ETA <Reeves.Phoebe@dol.gov>; ETAperforms <ETAperforms@dol.gov>
Cc: Antiri, Crystal - ETA <Antiri.Crystal@dol.gov>; Fox, Sean - ETA <Fox.Sean@dol.gov>
Subject: 2026-2027 Connecticut WIOA State Plan Modification Waiver Requests

Good morning,

The Governance team received the following waivers embedded in Connecticut's 2026-2027 WIOA State Plan Modification.

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8. **Statutory and/or regulatory requirements the state would like to waive:**
   CTDOL is seeking a waiver of the requirement under WIOA rule at 20 CFR §681.550, which limits the use of individual training accounts (ITAs) for youth participants to out-of-school youth (OSY) ages 16 to 24. CTDOL is seeking a waiver of this rule to extend the use of ITAs to in-school youth (ISY).
9. **Statutory and/or regulatory requirements the state would like to waive:**

WIOA §116(c) requires state and local performance accountability systems to use the same set of indicators of performance described in §116(b)(2)(A).

Please provide any comments or feedback on or before EOB – **Friday, March 13, 2026**.

Attached are the following documents for your review and comment.

- Copy of the Waiver Requests
- Waiver Guide

We can meet to discuss and deliberate the waiver requests received.

Let me know if you have any additional questions.

Best,

-Sonoi

Robert Sonoi Omwenga
National Office Waiver Point of Contact – REGION 1
Employment and Training Administration
Office of Workforce Investment (OWI)
Division of Adult Services and Governance (DASG)
United States Department of Labor
Phone: (202) 693-4378

From: Omwenga, Robert (Sonoi) - ETA
Sent: Thursday, March 26, 2026 5:48 AM
To: Fox, Sean - ETA <Fox.Sean@dol.gov>; Rosenberg, Evan - ETA <Rosenberg.Evan@dol.gov>
Cc: Antiri, Crystal - ETA <Antiri.Crystal@dol.gov>; Hastings, Sara - ETA <Hastings.Sara@dol.gov>; Fleck, Heather - ETA <fleck.heather@dol.gov>
Subject: FW: 2026-2027 Connecticut WIOA State Plan Modification Waiver Request

Good morning,

Please advise how to respond to CTDOL as it pertains to WIOA Section 129(a)(4)(A) and 20 CFR 681.410 that the State and local areas expend 75 percent local formula youth funds on out-of-school youth (OSY) ?

See CT-DOL response below to our clarification questions?

“We (CTDOL) did not intend to put in a waiver for PY26, but used this to check in with the locals to make sure they understood that.

Is this a form error we made by leaving the old one in the Portal/Plan section? We added new content but didn’t think we should remove the old one based on the time period.”

P.S: I previously forwarded this message for a response.

-Sonoi

Robert Sonoi Omwenga
National Office Waiver POC -REGION ONE
Employment and Training Administration
Office of Workforce Investment (OWI)
Division of Adult Services and Governance (DASG)
United States Department of Labor
Phone: (202) 693-4378

From: Reeves, Phoebe - ETA <Reeves.Phoebe@dol.gov>
Sent: Tuesday, March 24, 2026 12:53 PM
To: Omwenga, Robert (Sonoi) - ETA <Omwenga.Robert.S@dol.gov>
Subject: RE: 2026-2027 Connecticut WIOA State Plan Modification Waiver Request

Hi Sonoi,

I received the following question from Erica Tew on the Waiver comments from the team:

“We (CTDOL) did not intend to put in a waiver for PY26, but used this to check in with the locals to make sure they understood that.

Is this a form error we made by leaving the old one in the Portal/Plan section? We added new content but didn’t think we should remove the old one based on the time period.”

Can you please advise as to how best to respond to her question concerning the CT waiver?

Thanks so much,

Phoebe

Phoebe Reeves
Workforce Development Specialist
U.S. Department of Labor – ETA
JFK Federal Bldg., Room E-350
Boston, MA 02203
617-788-0127

From: Omwenga, Robert (Sonoi) - ETA <Omwenga.Robert.S@dol.gov>
Sent: Tuesday, March 24, 2026 12:14 PM
To: Reeves, Phoebe - ETA <Reeves.Phoebe@dol.gov>
Subject: RE: 2026-2027 Connecticut WIOA State Plan Modification Waiver Request

Thank you for the heads up.

-Sonoi

Robert Sonoi Omwenga
Employment and Training Administration
Office of Workforce Investment (OWI)
Division of Adult Services and Governance (DASG)
United States Department of Labor
Phone: (202) 693-4378

From: Reeves, Phoebe - ETA <Reeves.Phoebe@dol.gov>
Sent: Tuesday, March 24, 2026 11:40 AM
To: Omwenga, Robert (Sonoi) - ETA <Omwenga.Robert.S@dol.gov>
Subject: RE: 2026-2027 Connecticut WIOA State Plan Modification Waiver Request

Hi Sonoi,

I think that Erica Tew who is the WIOA Director for the State is at a conference for most of this remaining week so I may not hear back from her until week's end or beginning of next week.

Phoebe Reeves
Workforce Development Specialist
U.S. Department of Labor – ETA
JFK Federal Bldg., Room E-350
Boston, MA 02203
617-788-0127
