U.S. Department of Labor

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

July 20, 2026

The Honorable Jared Polis
Governor of Colorado
State Capitol Building
200 E. Colfax Avenue, Room 136
Denver, CO 80203

Dear Governor Polis:

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 April 30, 2026, as part of your recent WIOA State Plan modification submission. This letter provides the Employment and Training Administration's (ETA) official response to your request and memorializes that Colorado will meet the outcomes and implement the measures identified in its plan to ensure accountability agreed to by Colorado 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: Waiver of WIOA Section 129(c)(4) and 20 CFR 681.590(b), to allow local workforce development areas to count WIOA local youth formula, Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), and Medicaid funds toward the minimum 20 percent expenditure requirement for paid or unpaid work experience.

ETA Response: ETA approves, for Program Years (PYs) 2026 and 2027, which includes the entire time period for which states are authorized to spend PYs 2026 and 2027 funds, Colorado's request to allow local areas in the State to count SNAP, Medicaid, and TANF work experience expenditures, in addition to WIOA youth work experience expenditures, toward the 20 percent work experience expenditure requirement for WIOA youth co-enrolled in those programs. ETA reviewed the State's waiver request and plan and has determined that the requirements requested to be waived impede Colorado's ability to implement its plan to improve the workforce development system.

Requested Waiver: Waiver of the requirement that local youth programs make available each of the 14 youth program elements required under WIOA Section 129(c)(2).

ETA Response: ETA approves, for PYs 2026 and 2027, the State's request to waive the requirement that local areas must competitively procure all 14 required youth program elements listed in WIOA Section 129(c)(2) and 20 CFR 681.460. Under this approval, local areas are not required to procure providers for all 14 required youth program elements in order to support local area focus on the most needed services, such as work experiences, pre-apprenticeships, post-secondary education preparation, and to reduce the administrative cost and burden associated with competitive procurement of rarely-used services. The State's local areas may identify and procure any of the 14 required youth program elements on an as needed basis. ETA reviewed the State's request and plan and determined that the requirements requested to be waived impedes the State's ability to implement its plan to improve youth workforce development service delivery.

Requested Waiver: Waiver of the requirements outlined in WIOA Section 121(d)(2)(A) and 20 CFR Part 678.605, which requires selection of a one-stop operator (OSO) through a competitive process every four years.

ETA Response: ETA approves Colorado's waiver request through June 30, 2028. Prior to implementing this waiver, the State must provide ETA information that clearly explains the need for the waiver and how the waiver will result in improved and streamlined services to participants.

Requested Waiver: Waiver of the requirements at WIOA Section 106(a)(2) to allow the State Plan to serve as the Regional Plan for each of the State's identified regions.

ETA Response: ETA approves, through June 30, 2028, the State's request to waive the requirement that a planning region consist of one local workforce development area, two or more intrastate local areas, or two or more interstate local areas. This waiver allows Colorado the flexibility to assign the State's ten local workforce development areas to one statewide planning region and to use the WIOA State Plan as the regional plan. ETA reviewed the State's waiver request and plan and determined that the requirements requested to be waived impede the State's ability to implement its plan to improve the workforce development system and approves this waiver. Any local planning requirements that the Governor previously included in the Regional Plan must be reflected in each local plan.

The State is reminded that WIOA Title I waivers may not be used for any discriminatory purposes. All activities and waiver plan provisions must comply with Section 188 of WIOA, the implementing regulations at 29 CFR Part 38, and all applicable federal nondiscrimination laws.

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

Henry Mack, Ed.D.
Assistant Secretary

Enclosures

cc: Joe Barela, Executive Director, Colorado Department of Labor and Employment
Jessica Maiorca, Senior Consultant, Colorado Workforce Development Council
M. Frank Stluka, Acting Dallas Regional Administrator, ETA
Eva Mejia, Federal Project Officer, ETA

Colorado WIOA State Plan Modification (PY 2026-2027) Waiver Requests

Colorado Waiver Request #1

Expand and extend Colorado's current waiver to allow local workforce development areas to count both WIOA local youth formula funds and TANF funds toward the minimum 20 percent expenditure requirement for paid or unpaid work experience.

Colorado has received a waiver of WIOA Section 129(c)(4) and 20 CFR 681.590(b) for Program Years 2024 and 2025, to allow local workforce development areas to count both WIOA local youth formula funds and TANF funds toward the minimum 20 percent expenditure requirement for paid or unpaid work experience. We seek to extend this waiver to PY26 and PY27, and to allow Medicaid and SNAP funds used for work experiences to be counted toward the 20 percent.

Colorado's objective in seeking this waiver is to leverage federal resources, strengthen cross-program partnerships, and create an incentive for co-enrollments between the WIOA Youth and the TANF/SNAP/Medicaid programs. With the expansion of work requirements for SNAP and Medicaid recipients in the One Big Beautiful Bill Act (OBBBA), Colorado intends for this waiver to support this administration's vision for integrating systems and removing statutory barriers to allow flexibility and innovation.

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

WIOA Section 129(c)(4) and 20 CFR 681.590(b) allowing local workforce development areas to count both WIOA local youth formula funds and TANF/Medicaid/SNAP funds toward the minimum 20 percent expenditure requirement for paid or unpaid work experience.

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

N/A - There are no state or local statutory or regulatory barriers to implementing the proposed waiver.

3a. State strategic goal(s) supported by the waiver:

Colorado Combined State Plan includes Colorado's TANF program (Colorado Works). This waiver aligns with the following priority in Colorado's State Plan by leveraging public investments across programs.

PRIORITY TWO: INCREASE THE QUALITY OF UPSKILLING OPPORTUNITIES, JOBS, AND CAREER PATHWAYS

3b. Department of Labor priorities (i.e. expansion of apprenticeship, improved employer engagement, etc.) supported by the waiver:

In WIOA, Congress encouraged closer coordination between TANF/Medicaid/SNAP and the public workforce development system. The law requires WIOA-funded one-stop centers to partner with TANF unless the state's governor has affirmatively chosen to opt out. WIOA also permits states to include TANF and other partners in combined state workforce planning as Colorado has chosen to do, encouraging coordination among multiple programs.

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

Under this waiver, CDLE will include the amount of TANF/Medicaid/SNAP dollars spent on co-enrolled WIOA Youth during a program year in both the numerator and denominator of the Youth work experience expenditure rate calculation.

Colorado has included a waiver plan in its PY26-PY27 local area planning guidelines, which will identify those local areas that will implement this waiver. We will encourage implementation of this waiver by all 10 local areas so that they may build on and strengthen their partnerships with TANF/Medicaid/SNAP service providers.

This waiver would encourage co-enrollment and braiding of WIOA youth and TANF/Medicaid/SNAP funds by allowing more flexibility in serving youth. The quantifiable outcomes from this waiver will include increasing the number of WIOA-funded youth participants and increasing the number of youth co-enrolled in WIOA and TANF/Medicaid/SNAP so that youth have the full array of services and funding necessary to achieve successful completion of the program.

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

The waiver will benefit youth with barriers to employment, particularly individuals who are low income, recipients of public benefits, and/or who identify a disability, and by allowing local areas to fund services in a manner that best meets the needs of the participant. It will also benefit a larger number of youth by extending WIOA funds and allowing resources to go further.

6. How the State plans to monitor waiver implementation, including collection of measurable waiver outcome information:

CDLE has a long standing, comprehensive monitoring and performance accountability system that measures and evaluates results for job seekers and employers accessing Colorado's network of One-Stop centers. On a monthly and quarterly basis, CDLE reviews and analyzes client enrollment and service levels, program expenditures, and performance outcomes. In addition, State program monitors conduct quarterly reviews designed to assure that contract requirements are being met for all WIOA programs. On an annual basis, comprehensive compliance monitoring is conducted onsite.

Should this waiver request be granted, CDLE will regularly monitor the impacts of this waiver authority to ensure appropriateness and effectiveness, specifically tracking the number of youth co-enrolled in WIOA and TANF/Medicaid/SNAP, and the overall number of youth served in WIOA. CDLE will track and report on the outcomes in the WIOA Annual Report.

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

This waiver request will be published for a period of 30 days with the WIOA State Plan on the public website maintained by the Colorado Workforce Development Council, allowing for public comment on its content and potential impact. In addition, electronic copies of the waiver will be sent via email to local boards and one-stop operators.

Colorado Waiver Request #2

SEC. 123. Identification of Eligible Providers of Youth Activities: From funds allocated under paragraph (2)(A) or (3) of section 128(b) to a local area, the local board for such area shall identify eligible providers of youth activities by awarding grants or contracts on a competitive basis, based on the recommendations of the youth council and on the criteria contained in the State plan, to the providers to carry out the activities, and shall conduct oversight with respect to the providers, in the local area.

Waiving the requirement for local areas to procure and conduct oversight of the providers of all 14 youth program elements would allow them to focus funding on the most needed services (e.g. work experiences, pre-apprenticeships, post-secondary preparation, or non-element services such as apprenticeships). The waiver would also relieve a regularly scheduled administrative cost and process burden to procure services, and oversee service providers, which are rarely if ever used.

Each local area implementing the waiver would be provided the flexibility to identify and procure any of the 14 elements on an as-needed basis, rather than maintaining an ongoing list of all 14 that has to be updated on a regular basis. Local areas would not be allowed to eliminate access to any of the elements.

This waiver, if approved, would be implemented in PY26 and PY27.

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

N/A - There are no state or local statutory or regulatory barriers to implementing the proposed waiver.

3a. State strategic goal(s) supported by the waiver:

This waiver aligns with the following priority in Colorado's State Plan by leveraging public investments across programs.

- **Priority 1**: Align State priorities and flexible resources to ensure all Coloradans have access to opportunities for quality, life-long education connected to the future of work.
- **Priority 2**: Increase the quality of upskilling opportunities, jobs, and career pathways

3b. Department of Labor priorities (i.e. expansion of apprenticeship, improved employer engagement, etc.) supported by the waiver:

- **Accountability:** The public workforce system can support this pillar by identifying and eliminating ineffective spending, redirecting funding to programs and services that demonstrate success in preparing and connecting participants with high-wage jobs through work-based learning opportunities such as apprenticeships.
- Title I of WIOA outlines a **broad youth vision** that supports an integrated service delivery system and provides a framework through which states and local areas can leverage other Federal, state, local, and philanthropic resources to more effectively and innovatively serve all at-risk youth.
- Colorado currently has three youth waivers that can work together with this waiver to increase flexibility in the design and delivery of youth services. They are:
    - Waiver of the 75% expenditure requirement for out-of-school youth
    - Waiver to allow ITAs for youth
    - Waiver to allow TANF to be counted for the youth 20% work experience expenditure requirement

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

Approval of this waiver would result in:

- An increase in the number of youth participants who receive work-based learning opportunities for PY26 and PY27
- Performance accountability outcomes for the State for WIOA Youth will remain steady or increase for the majority of the WIOA Youth performance indicators for PY26 and PY27.

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

This waiver is intended to benefit all at-risk youth eligible for the Title I Youth Program, regardless of school status, and in particular those youth that are seeking career pathways involving work-based learning with an emphasis on shorter-term academic preparation, rather than 2-year or 4-year degrees.

6. How the State plans to monitor waiver implementation, including collection of measurable waiver outcome information:

CDLE has a long standing, comprehensive monitoring and performance accountability system that measures and evaluates results for job seekers and employers accessing Colorado's network of One-Stop centers. On a monthly and quarterly basis, CDLE reviews and analyzes client enrollment and service levels, program expenditures, and performance outcomes. In addition, State program monitors conduct quarterly reviews designed to assure that contract requirements are being met for all WIOA programs. On an annual basis, comprehensive compliance monitoring is conducted onsite.

Should this waiver request be granted, CDLE will regularly monitor the impacts of this waiver authority to ensure appropriateness and effectiveness, specifically tracking the number of youth co-enrolled in WIOA and TANF/Medicaid/SNAP, and the overall number of youth served in WIOA. CDLE will track and report on the outcomes in the WIOA Annual Report.

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

This waiver request will be published for a period of 30 days with the WIOA State Plan on the public website maintained by the Colorado Workforce Development Council, allowing for public comment on its content and potential impact. In addition, electronic copies of the waiver will be sent via email to local boards and one-stop operators.

Colorado Waiver Request #3

Section 121(d)(2)(A) of Workforce Innovation Opportunity Act (WIOA): Requires One Stop operators to be designated or certified through a competitive process. Competition provides the best method of ensuring that Local Workforce Development Boards examine operator effectiveness on a periodic basis.

Under WIOA, all local workforce development boards must select a one-stop operator through a competitive process, and support continuous improvement through the evaluation of one-stop operator performance and the re-competition of operators every four years. Contracts for the one-stop operator are considered to be subrecipient agreements and must be monitored using the requirements of WIOA and the OMB Uniform Guidance. This requirement duplicates administrative and programmatic functions already performed by local area staff. In addition, eliminating this requirement would relieve local areas of an administrative burden and costs that could be redirected to program services such as apprenticeships and other work-based learning.

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

N/A - There are no state or local statutory or regulatory barriers to implementing the proposed waiver.

3a. State strategic goal(s) supported by the waiver:

This waiver aligns with the following priority in Colorado's State Plan by leveraging public investments across programs.

- **Priority 1**: Align State priorities and flexible resources to ensure all Coloradans have access to opportunities for quality, life-long education connected to the future of work.
- **Priority 2**: Increase the quality of upskilling opportunities, jobs, and career pathways

3b. Department of Labor priorities (i.e. expansion of apprenticeship, improved employer engagement, etc.) supported by the waiver:

- **Accountability:** The public workforce system can support this pillar by identifying and eliminating ineffective spending, redirecting funding to programs and services that demonstrate success in preparing and connecting participants with high-wage jobs through workbased learning opportunities such as apprenticeships.

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

Because the approval of this waiver would impact all programs and grants operated by comprehensive one-stop centers:

- We would expect that local areas implementing this waiver would be able to increase their in-person staff by the percentage of an FTE commensurate with the current cost of the contracted one-stop operator.
- In addition, performance accountability outcomes for the State for WIOA Title I programs will remain steady or increase for the majority of the WIOA performance indicators for PY26 and PY27.

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

Because the one-stop operator is the primary coordinator of all the partner programs that participate in the comprehensive one-stop centers, all one-stop customers would benefit from moving the administrative costs associated with procuring the one-stop operator to program services. These individuals include WIOA Title I and III reportables and participants, particularly those underserved populations enrolled in WIOA Title I who require individualized career services, and training and supportive services with associated direct client costs.

6. How the State plans to monitor waiver implementation, including collection of measurable waiver outcome information:

CDLE has a longstanding, comprehensive monitoring and performance accountability system that measures and evaluates results for job seekers and employers accessing Colorado’s network of One-Stop centers. On a monthly and quarterly basis, CDLE reviews and analyzes client enrollment and service levels, program expenditures, and performance outcomes. In addition, State program monitors conduct quarterly reviews designed to assure that contract requirements are being met for all WIOA programs. On an annual basis, comprehensive compliance monitoring is conducted onsite.

Should this waiver request be granted, CDLE will regularly monitor the impacts of this waiver authority to ensure appropriateness and effectiveness, specifically tracking the number of youth co-enrolled in WIOA and TANF/Medicaid/SNAP, and the overall number of youth served in WIOA. CDLE will track and report on the outcomes in the WIOA Annual Report.

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

This waiver request will be published for a period of 30 days with the WIOA State Plan on the public website maintained by the Colorado Workforce Development Council, allowing for public comment on its content and potential impact. In addition, electronic copies of the waiver will be sent via email to local boards and one-stop operators.

Colorado Waiver Request #4

Waive requirement to create planning regions and submit unique regional plans in addition to the local area plans.

1. The statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan:

Section 106(a) of Workforce Innovation Opportunity Act (WIOA): Regions, and Section 106(c): Regional Coordination. Colorado's compliance with these sections of WIOA has created three planning regions in the state that expend time and limited resources to produce regional plans. However, Colorado's ten local workforce areas work together and align service strategies, share critical industries that touch every area, and currently have multiple organizing entities that work across all local areas. We believe that our strategies can be best aligned to the federal administration's pillars, work can be streamlined, and administrative burden and costs can be reduced if Colorado can name all 10 local areas as one planning region and have the state plan serve as the regional plan.

2. The actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers:

Colorado has worked with local areas to streamline planning requirements as much as possible. The state has one master licensing agreement in place with a data provider to allow for all areas to get access to high quality data. Despite these efforts, the existing regional planning structure creates a large staff time burden that directs resources away from customers and creates confusion in the field due to the high number of plans that are in place.

3. The goals of the waiver and the expected programmatic outcomes if the request is granted:

The overarching goal of this waiver is to create stronger alignment between local implementation of workforce programs and *America's Talent Strategy*. By utilizing this state plan as the regional plan for all of Colorado, there is greater clarity on the strategies, priorities, and implementation approaches that will yield success for businesses and employers. The specific goal is to reduce administrative burden through the time spent on planning activities and the costs associated with those activities.

4. How the waiver will align with the Department's policy priorities, such as:

This waiver will create better clarity and stronger alignment of services because all regions will work from the same playbook outlined in the state plan. Employers will have fewer places to look for information and therefore will have a more streamlined path to engagement with their local areas.

5. The individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment:

This request will primarily impact decision makers and board members who will have a more clear understanding of the plans in place and the needs of their community. Services will be impacted positively because administration will be reduced and more dollars will be available to be used for direct services, support, and training.

6. How the State plans to monitor waiver implementation, including collection of measurable waiver outcome information:

CDLE has a longstanding, comprehensive monitoring and performance accountability system that measures and evaluates results for job seekers and employers accessing Colorado's network of One-Stop centers. On a monthly and quarterly basis, CDLE reviews and analyzes client enrollment and service levels, program expenditures, and performance outcomes. In addition, State program monitors conduct quarterly reviews designed to assure that contract requirements are being met for all WIOA programs. On an annual basis, comprehensive compliance monitoring is conducted onsite.

Should this waiver request be granted, CDLE will regularly monitor the impacts of this waiver authority to ensure appropriateness and effectiveness, specifically tracking the number of youth co-enrolled in WIOA and TANF/Medicaid/SNAP, and the overall number of youth served in WIOA. CDLE will track and report on the outcomes in the WIOA Annual Report.

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

This waiver request will be published for a period of 30 days with the WIOA State Plan on the public website maintained by the Colorado Workforce Development Council, allowing for public comment on its content and potential impact. In addition, electronic copies of the waiver will be sent via email to local boards and one-stop operators.

Colorado WIOA State Plan Modification (PY 2026-2027) Additional Waiver Information

Waiver Request: WIOA Section 129(c)(4) and 20 CFR 681.590(b) – Counting Local Youth and TANF Funds Toward Work Experience Expenditures

- Revise Section 4 to provide projected and quantifiable program outcomes for the approved PY 2024–2025 waiver and include future projections and quantifiable outcomes for PY 2026–2027.
- Revise Section 7 to confirm whether the public comment period occurred.

Colorado Waiver Request #1

Expand and extend Colorado's current waiver to allow local workforce development areas to count both WIOA local youth formula funds and TANF funds toward the minimum 20 percent expenditure requirement for paid or unpaid work experience.
Colorado has received a waiver of WIOA Section 129(c)(4) and 20 CFR 681.590(b) for Program Years 2024 and 2025, to allow local workforce development areas to count both WIOA local youth formula funds and TANF funds toward the minimum 20 percent expenditure requirement for paid or unpaid work experience. We seek to extend this waiver to PY26 and PY27, and to allow Medicaid and SNAP funds used for work experiences to be counted toward the 20 percent.

Colorado's objective in seeking this waiver is to leverage federal resources, strengthen cross-program partnerships, and create an incentive for co-enrollments between the WIOA Youth and the TANF/SNAP/Medicaid programs. With the expansion of work requirements for SNAP and Medicaid recipients in the One Big Beautiful Bill Act (OBBBA), Colorado intends for this waiver to support this administration's vision for integrating systems and removing statutory barriers to allow flexibility and innovation.

1. The statutory and/or regulatory requirements the State would like to waive:
WIOA Section 129(c)(4) and 20 CFR 681.590(b) allowing local workforce development areas to count both WIOA local youth formula funds and TANF/Medicaid/SNAP funds toward the minimum 20 percent expenditure requirement for paid or unpaid work experience.

2. Actions the State has undertaken to remove State or local barriers:
N/A - There are no state or local statutory or regulatory barriers to implementing the proposed waiver.

3a. State strategic goal(s) supported by the waiver:
Colorado Combined State Plan includes Colorado's TANF program (Colorado Works). This waiver aligns with the following priority in Colorado's State Plan by leveraging public investments across programs.

PRIORITY TWO: INCREASE THE QUALITY OF UPSKILLING OPPORTUNITIES, JOBS, AND CAREER PATHWAYS

3b. Department of Labor priorities (i.e. expansion of apprenticeship, improved employer engagement, etc.) supported by the waiver:
In WIOA, Congress encouraged closer coordination between TANF/Medicaid/SNAP and the public workforce development system. The law requires WIOA-funded one-stop centers to partner with TANF unless the state's governor has affirmatively chosen to opt out. WIOA also permits states to include TANF and other partners in combined state workforce planning as Colorado has chosen to do, encouraging coordination among multiple programs.

4. Quantifiable projected programmatic outcomes resulting from implementation of the Waiver:
Under this waiver, CDLE will include the amount of TANF/Medicaid/SNAP dollars spent on co-enrolled WIOA Youth during a program year in both the numerator and denominator of the Youth work experience expenditure rate calculation.
Colorado has included a waiver plan in its PY26-PY27 local area planning guidelines, which will identify those local areas that will implement this waiver. We will encourage implementation of this waiver by all 10 local areas so that they may build on and strengthen their partnerships with TANF/Medicaid/SNAP service providers.
This waiver would encourage co-enrollment and braiding of WIOA youth and TANF/Medicaid/SNAP funds by allowing more flexibility in serving youth.

The quantifiable outcomes from this waiver will include increasing the number of WIOA-funded youth participants by 5% in PY26 and 5% in PY27, and increasing the number of youth co-enrolled in WIOA and TANF/Medicaid/SNAP by 3% in PY26 and 3% in PY27 so that youth have the full array of services and funding necessary to achieve successful completion of the program.

5. Individuals, groups or populations benefitting from the waiver:
The waiver will benefit youth with barriers to employment, particularly individuals who are low income, recipients of public benefits, and/or who identify a disability, and by allowing local areas to fund services in a manner that best meets the needs of the participant. It will also benefit a larger number of youth by extending WIOA funds and allowing resources to go further.

6. How the State plans to monitor waiver implementation, including collection of measurable waiver outcome information:
CDLE has a long standing, comprehensive monitoring and performance accountability system that measures and evaluates results for job seekers and employers accessing Colorado's network of One-Stop centers. On a monthly and quarterly basis, CDLE reviews and analyzes client

enrollment and service levels, program expenditures, and performance outcomes. In addition, State program monitors conduct quarterly reviews designed to assure that contract requirements are being met for all WIOA programs. On an annual basis, comprehensive compliance monitoring is conducted onsite.
Should this waiver request be granted, CDLE will regularly monitor the impacts of this waiver authority to ensure appropriateness and effectiveness, specifically tracking the number of youth co-enrolled in WIOA and TANF/Medicaid/SNAP, and the overall number of youth served in WIOA, as indicated in section 4 above. CDLE will track and report on the outcomes in the WIOA Annual Report.

7. Assurance of State posting of the request for public comment and notification to affected local workforce development boards:
This waiver request was first announced publicly as a part of the January 2026 CWDC Council Meeting. It was circulated to Council members as a part of the review and approval process that took place for the Council to approve the plan for public posting. The full waiver request was then published with the WIOA State Plan on the public website maintained by the Colorado Workforce Development Council from March 19, 2026 through April 19, 2026, allowing for public comment on its content and potential impact. In addition, electronic copies of the waiver were emailed to local boards and one-stop operators. There were no comments received during the comment period regarding this waiver.

Waiver Request: WIOA Section 123 – Competitive Procurement of Youth Service Providers

- Revise the waiver to clarify what the state is requesting. Specify whether the state is requesting a waiver to not make available all 14 youth program elements, or to procure youth service providers in each local area and not monitor the use of the 14 program elements.
- Revise Section 4 to include projected and quantifiable program outcomes.
- Revise Section 7 to confirm whether the public comment period occurred.

Colorado Waiver Request #2

SEC. 123. Identification of Eligible Providers of Youth Activities: From funds allocated under paragraph (2)(A) or (3) of section 128(b) to a local area, the local board for such area shall identify eligible providers of youth activities by awarding grants or contracts on a competitive basis, based on the recommendations of the youth council and on the criteria contained in the State plan, to the providers to carry out the activities, and shall conduct oversight with respect to the providers, in the local area. The waiver is intended to allow the procurement of fewer than 14 program elements, when appropriate. Monitoring the use of all elements procured would not be waived.

Waiving the requirement for local areas to procure the providers of all 14 youth program elements would allow local areas to focus funding on the most needed services (e.g. work experiences, pre-apprenticeships, post-secondary preparation, or non-element services such as apprenticeships). The waiver would also reduce a regularly scheduled administrative cost and process burden to procure services, which are rarely if ever used.

Each local area implementing the waiver would be provided the flexibility to identify and procure any of the 14 elements on an as-needed basis, rather than maintaining an ongoing list of all 14 that has to be updated on a regular basis. Local areas would not be allowed to eliminate access to any of the elements. This waiver, if approved, would be implemented in PY26 and PY27.

2. Actions the State has undertaken to remove State or local barriers:
N/A - There are no state or local statutory or regulatory barriers to implementing the proposed waiver.

3a. State strategic goal(s) supported by the waiver:
This waiver aligns with the following priority in Colorado's State Plan by leveraging public investments across programs.

- **Priority 1**: Align State priorities and flexible resources to ensure all Coloradans have access to opportunities for quality, life-long education connected to the future of work.

- **Priority 2**: Increase the quality of upskilling opportunities, jobs, and career pathways

3b. Department of Labor priorities (i.e. expansion of apprenticeship, improved employer engagement, etc.) supported by the waiver:

- **Accountability:** The public workforce system can support this pillar by identifying and eliminating ineffective spending, redirecting funding to programs and services that demonstrate success in preparing and connecting participants with high-wage jobs through work-based learning opportunities such as apprenticeships.
- Title I of WIOA outlines a **broad youth vision** that supports an integrated service delivery system and provides a framework through which states and local areas can leverage other Federal, state, local, and philanthropic resources to more effectively and innovatively serve all at-risk youth.
- Colorado currently has three youth waivers that can work together with this waiver to increase flexibility in the design and delivery of youth services. They are:
    - Waiver of the 75% expenditure requirement for out-of-school youth
    - Waiver to allow ITAs for youth
    - Waiver to allow TANF to be counted for the youth 20% work experience expenditure requirement

4. Quantifiable projected programmatic outcomes resulting from implementation of the Waiver:
Approval of this waiver would result in:

- A 3% increase in the number of youth participants who receive work-based learning opportunities for PY26 and PY27
- Performance accountability outcomes for the State for WIOA Youth will remain steady or increase by 3% for the majority of the WIOA Youth performance indicators for PY26 and PY27.

5. Individuals, groups or populations benefitting from the waiver:
This waiver is intended to benefit all at-risk youth eligible for the Title I Youth Program, regardless of school status, and in particular those youth that are seeking career pathways involving work-based learning with an emphasis on shorter-term academic preparation, rather than 2-year or 4-year degrees.

6. How the State plans to monitor waiver implementation, including collection of measurable waiver outcome information:
CDLE has a long standing, comprehensive monitoring and performance accountability system that measures and evaluates results for job seekers and employers accessing Colorado's network of One-Stop centers. On a monthly and quarterly basis, CDLE reviews and analyzes client enrollment and service levels, program expenditures, and performance outcomes. In addition,

State program monitors conduct quarterly reviews designed to assure that contract requirements are being met for all WIOA programs. On an annual basis, comprehensive compliance monitoring is conducted onsite.
Should this waiver request be granted, CDLE will regularly monitor the impacts of this waiver authority to ensure appropriateness and effectiveness, specifically tracking the number of youth co-enrolled in WIOA and TANF/Medicaid/SNAP, and the overall number of youth served in WIOA. CDLE will track and report on the outcomes in the WIOA Annual Report.

7. Assurance of State posting of the request for public comment and notification to affected local workforce development boards:
This waiver request was first announced publicly as a part of the January 2026 CWDC Council Meeting. It was circulated to Council members as a part of the review and approval process that took place for the Council to approve the plan for public posting. The full waiver request was then published with the WIOA State Plan on the public website maintained by the Colorado Workforce Development Council from March 19, 2026 through April 19, 2026, allowing for public comment on its content and potential impact. In addition, electronic copies of the waiver were emailed to local boards and one-stop operators. There were no comments received during the comment period regarding this waiver.

Waiver Request: WIOA Section 121(d)(2)(A) – Competitive Procurement of One-Stop Operators

- Revise the waiver to clarify whether the state is requesting to waive competitive procurement requirement of the one-stop operator or waive subrecipient monitoring requirements.
- Revise Section 4 to provide projected and quantifiable program outcomes.
- Revise Section 6 to include monitoring language that applies specifically to this waiver rather than language related to the WIOA Youth Program.
- Revise Section 7 to confirm whether the public comment period occurred.

Colorado Waiver Request #3

Section 121(d)(2)(A) of Workforce Innovation Opportunity Act (WIOA): Requires One Stop operators to be designated or certified through a competitive process. Competition provides the best method of ensuring that Local Workforce Development Boards examine operator effectiveness on a periodic basis.

Under WIOA, all local workforce development boards must select a one-stop operator through a competitive process, and support continuous improvement through the evaluation of one-stop operator performance and the re-competition of operators every four years. Colorado policy repeats this requirement. It also requires a sole source procurement process for local area fiscal agents to serve as the one-stop operator, plus the execution of a sub-recipient agreement between local area fiscal agent entities. Colorado is seeking to waive the local area requirement to procure a one-stop operator, whether it be an outside entity or a local area fiscal agent entity, and, if this waiver is approved, to eliminate the need to execute and monitor the sub-recipient contract for the one-stop operator. All other sub-recipient contracts would continue to be monitored using the requirements of WIOA and the OMB Uniform Guidance.

This requirement duplicates administrative and programmatic functions already performed by local area staff. In addition, eliminating this requirement would relieve local areas of an administrative burden and costs that could be redirected to program services such as apprenticeships and other work-based learning.

2. Actions the State has undertaken to remove State or local barriers:
N/A - There are no state or local statutory or regulatory barriers to implementing the proposed waiver.

3a. State strategic goal(s) supported by the waiver:
This waiver aligns with the following priority in Colorado's State Plan by leveraging public investments across programs.

- **Priority 1**: Align State priorities and flexible resources to ensure all Coloradans have access to opportunities for quality, life-long education connected to the future of work.
- **Priority 2**: Increase the quality of upskilling opportunities, jobs, and career pathways

3b. Department of Labor priorities (i.e. expansion of apprenticeship, improved employer engagement, etc.) supported by the waiver:

- **Accountability:** The public workforce system can support this pillar by identifying and eliminating ineffective spending, redirecting funding to programs and services that demonstrate success in preparing and connecting participants with high-wage jobs through work-based learning opportunities such as apprenticeships.

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

Because the approval of this waiver would impact all programs and grants operated by comprehensive one-stop centers:

- Median Earnings (Adult/Dislocated Worker/Youth) would increase by:
  - PY26: +$25
  - PY27: +$40
- We would expect that local areas implementing this waiver would be able to increase their career services staff by .25 FTE resulting from reduced administrative costs.

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

Because the one-stop operator is the primary coordinator of all the partner programs that participate in the comprehensive one-stop centers, all one-stop customers would benefit from moving the administrative costs associated with procuring the one-stop operator to program services. These individuals include WIOA Title I and III reportables and participants, particularly those underserved populations enrolled in WIOA Title I who require individualized career services, and training and supportive services with associated direct client costs.

6. How the State plans to monitor waiver implementation, including collection of measurable waiver outcome information:

CDLE has a longstanding, comprehensive monitoring and performance accountability system that measures and evaluates results for job seekers and employers accessing Colorado’s network of One-Stop centers. On a monthly and quarterly basis, CDLE reviews and analyzes client enrollment and service levels, program expenditures, and performance outcomes. In addition, State program monitors conduct quarterly reviews designed to assure that contract requirements are being met for all WIOA programs. On an annual basis, comprehensive compliance monitoring is conducted onsite.

Should this waiver request be granted, CDLE will regularly monitor the impacts of this waiver authority to ensure appropriateness and effectiveness, specifically tracking any increase in program FTE and the PY26 and PY27 performance indicator outcomes. CDLE will track and report on the outcomes in the WIOA Annual Report.

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

This waiver request was first announced publicly as a part of the January 2026 CWDC Council Meeting. It was circulated to Council members as a part of the review and approval process that took place for the Council to approve the plan for public posting. The full waiver request was then published with the WIOA State Plan on the public website maintained by the Colorado Workforce Development Council from March 19, 2026 through April 19, 2026, allowing for public comment on its content and potential impact. In addition, electronic copies of the waiver were emailed to local boards and one-stop operators. There were no comments received during the comment period regarding this waiver.

Waiver Request: WIOA Sections 106(a) and 106(c) – Regions and Regional Coordination

- Revise Section 6 to include monitoring language relevant to this waiver request rather than the WIOA Youth Program.
- Revise Section 7 to confirm whether the public comment period occurred.

Colorado Waiver Request #4

Waive requirement to create planning regions and submit unique regional plans in addition to the local area plans.

1. The statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan:
Section 106(a) of Workforce Innovation Opportunity Act (WIOA): Regions, and Section 106(c): Regional Coordination. Colorado's compliance with these sections of WIOA has created three planning regions in the state that expend time and limited resources to produce regional plans. However, Colorado's ten local workforce areas work together and align service strategies, share critical industries that touch every area, and currently have multiple organizing entities that work across all local areas. We believe that our strategies can be best aligned to the federal administration's pillars, work can be streamlined, and administrative burden and costs can be reduced if Colorado can name all 10 local areas as one planning region and have the state plan serve as the regional plan.

2. The actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers:
Colorado has worked with local areas to streamline planning requirements as much as possible. The state has one master licensing agreement in place with a data provider to allow for all areas to get access to high quality data. Despite these efforts, the existing regional planning structure creates a large staff time burden that directs resources away from customers and creates confusion in the field due to the high number of plans that are in place.

3. The goals of the waiver and the expected programmatic outcomes if the request is granted:
The overarching goal of this waiver is to create stronger alignment between local implementation of workforce programs and *America's Talent Strategy*. By utilizing this state plan as the regional plan for all of Colorado, there is greater clarity on the strategies, priorities, and implementation approaches that will yield success for businesses and employers. The specific goal is to reduce administrative burden through the time spent on planning activities and the costs associated with those activities.

4. How the waiver will align with the Department's policy priorities, such as:
This waiver will create better clarity and stronger alignment of services because all local areas will work from the same playbook outlined in the state plan. Employers will have fewer places to look for information and therefore will have a more streamlined path to engagement with their local areas.

5. The individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment:
This request will primarily impact decision makers and board members who will have a more clear understanding of the plans in place and the needs of their community. Services will be impacted positively because administration will be reduced and more dollars will be available to be used for direct services, support, and training.

6. How the State plans to monitor waiver implementation, including collection of measurable waiver outcome information:
CDLE has a longstanding, comprehensive monitoring and performance accountability system that measures and evaluates results for job seekers and employers accessing Colorado's network of One-Stop centers. On a monthly and quarterly basis, CDLE reviews and analyzes client enrollment and service levels, program expenditures, and performance outcomes. In addition, State program monitors conduct quarterly reviews designed to assure that contract requirements are being met for all WIOA programs. On an annual basis, comprehensive compliance monitoring is conducted onsite.

Should this waiver request be granted, CDLE will monitor the impacts of this waiver authority to ensure appropriateness and effectiveness. In total, we estimate approval of this waiver request will:

- Save 270-360 hours of work across the state, broken down as follows:
    - 240-360 hours statewide for regional plan creation. Each regional plan takes approximately 80-100 dedicated hours for writing. This does not include review and signature by other entities within the local areas in the regions, which can add a significant number of hours if staff need to attend in-person meetings over a vast area.
    - 30-60 hours statewide for data reports. Colorado's Workforce Intelligence Data Expert Team (WIDE) uses 10-20 hours to pull and analyze data into a report for each region.
- Reduce opportunity costs, enabling workforce staff to focus on other work.

Specifically, monitoring staff will work with local workforce areas to identify the time and cost-savings realized by not creating regional plans. CDLE will track and report on the outcomes in the WIOA Annual Report.

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

This waiver request was first announced publicly as a part of the January 2026 CWDC Council Meeting. It was circulated to Council members as a part of the review and approval process that took place for the Council to approve the plan for public posting. The full waiver request was then published with the WIOA State Plan on the public website maintained by the Colorado Workforce Development Council from March 19, 2026 through April 19, 2026, allowing for public comment on its content and potential impact. In addition, electronic copies of the waiver were emailed to local boards and one-stop operators. There were no comments received during the comment period regarding this waiver.