

U.S. Department of Labor

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



May 18, 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 March 3, 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 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.

ETA Response: The State requested this waiver on December 11, 2025. ETA approved this waiver and the waiver remains in effect until June 30, 2028.

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

ETA Response: ETA approves, for Program Year (PY) 2026 and PY 2027, 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 local workforce development boards.

ETA Response: After a review of the request and subsequent conversations with the State, ETA understands that Connecticut does not seek to waive performance accountability requirements under Section 116, but rather to introduce additional measures to improve local area performance management. Therefore, as indicated in a letter ETA sent to Connecticut on March 9, 2026, 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.

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

ETA Response: ETA granted approval for this waiver on May 30, 2024, and it is applicable to PY 2024 and PY 2025, covering the full three-year fund period. This approval will remain in effect throughout its duration. ETA received correspondence on March 24, 2026, clarifying that the State did not seek to renew this waiver request for PY 2026.

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,

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

Henry Mack, Ed.D.
Assistant Secretary

Enclosures

cc: Stephen Dombrowski, Director, CTDOL
Erica Tew, Director, WIOA Administration, CTDOL
Danielle Worthen-Ramos, Acting Regional Administrator, ETA
Phoebe Reeves, Federal Project Officer, ETA

Connecticut 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, local boards 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

Local Workforce Development Boards have 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 to identify barriers that limited local flexibility in investing in incumbent worker training and related upskilling strategies. Employers and industry partners were engaged throughout this process in convenings lead by the Workforce Development Boards and their Regional Sector Partnerships, 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 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 through surveys and feedback mechanisms to assess our statewide support of industry partners.

Projected Outcomes Under the Waiver

Metric	Year 1	Year 2	Notes
Incumbent Worker Training Participants	≥ 88 workers	200 workers	RSP Employers have current workers.
Participating Employers	25 employers	50 employers	Projected statewide increase in funding under the waiver.
Credential Attainment Rate for IWTs	65%	75%	Based on models such as MPI (placement) and METAL.
Employer Retention / Engagement	Establish baseline survey	≥ 80% repeat engagement rate	Measured through surveys and 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 workforce development boards 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 workforce boards 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 Workforce Development Board (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 local boards 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 local 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 evidence 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 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 2 - 20 CFR §681.550

1. 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).

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

There are no state or local statutory or regulatory 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 in-school youth (ISY) ages 16-21 the same participant choice options that out-of-school youth (OSY) have by allowing workforce area staff to use Individual Training Accounts (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) for youth and young adults.

Youth participants have expressed strong interest in entrepreneurial and self-employment pathways, and programs like Nail Technician, Lash Technician, and Real Estate licensure programs that are currently listed on the ETPL are of particular interest to the younger population. These entry points allow youth to develop business ownership skills while gaining credentials. 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 Boards 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, Boards 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.

This waiver aligns with DOL's policy priorities by increasing youth access to education, training, and employment opportunities; ensuring that at-risk ISY do not fall into a regulatory gap; and supporting WIOA's goals to expand program options, increase flexibility, and enhance customer choice.

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
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 US Credential not yet available.

Projected Outcome	Waiver Target	Current Baseline (Regular WIOA)
Percentage of ISY who achieve measurable skill gains	80%	PY23 Pre-Adjusted Reports on USD 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 high-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 youth 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 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 that are submitted by the Boards, through regularly scheduled conference calls with Board 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, then 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 local Workforce Development Boards (WDBs). This flexibility would allow the state to promote service integration across Titles I-IV and remove barriers that discourage serving certain In-School Youth (ISY) populations, particularly those engaged in secondary transition programs under their Individualized Education Programs (IEPs).

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

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

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

CTDOL requests a waiver from WIOA §116(c) to allow greater flexibility when contracting performance measures with local Workforce Development Boards (WDBs). This flexibility would allow the state to promote service integration across Titles I-IV and remove barriers that discourage serving certain In-School Youth (ISY) populations, 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. 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 local Boards will identify youth participating in transition programs as Out-of-School Youth (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.
- Local Boards 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 occurrence. 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 in-school youth (ISY)- particularly students with disabilities and those participating in transition programs under Individualized Education Programs (IEPs)- as well as Out-of-School Youth (OSY) and local workforce development boards 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 the U.S. Department of Labor'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;
- Promoting earlier workforce exposure and transition from secondary education to postsecondary and career opportunities; and

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 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.

APPROVED Waiver - WIOA SEC. 129 (a)(4)(A)

1. The statutory and/or regulatory requirements the state would like to waive;

The state aims to waive the current WIOA out-of-school youth expenditure requirement of 75% to 50% for the Northwest and Southwest Workforce Development Boards: Northwest Regional Workforce Investment Board and the WorkPlace, Inc. The expenditure requirement for out-of-school youth prevents the state from being responsive and agile to support all youth as Connecticut's economy recovers from a pandemic and seeks to decrease the rate of disconnection among marginalized youth. The other regions already have a presence for in school and out of school programming in WIOA (Eastern Workforce Investment Board, Inc. and The Workforce Alliance, Inc.) or the WIOA fund use exclusively prioritizes the Out of School population (Capital Workforce Partners, Inc.).

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

To eliminate state or local barriers, the state continues to conduct a comprehensive review of existing policies and engaged in consultations with local stakeholders to identify and address obstacles hindering the effective provision of services to both in-school and out-of-school youth. For example, where funding is available, the state is supportive of new outreach and recruitment methods to find youth (such as social media campaigns and on-site locations in schools or areas where youth congregate outside of the standard brick and mortar AJC) as well as increasing supportive services and mentorship opportunities for youth. The state, in alignment with USDOL guidance, allows funding to support eligibility

needs, has expanded access in data sharing agreements from partnering agencies, and is encouraging the use of self-attestations.

3. A description of the state's strategic goal(s);

The state's strategic goal is built on foundational pillars of aligning workforce systems, serving marginalized communities, and using data to drive decision making through transparency and accountability. The state is expanding education to career pathways from high school to post-secondary education or sector based trainings. The goal for pathways is to lead to high quality, sustainable jobs that pay competitively. As an additional driver to this need, in 2022, it was identified that one in five of Connecticut's young people were either at-risk or disconnected. These are 119,000 young people who have either dropped out of school or are in danger of dropping out of school. (Report from Dalio Education, accessible online: <https://www.dalioeducation.org/report/>). As a result of this report and the foundational strategies to align workforce systems, Connecticut is focused on supporting at-risk in-school students to avoid disconnection, and leverage resources to continue to serve disconnected youth across many workforce systems including WIOA.

Our goal through this waiver request is to expand In School Programming in regions where it does not currently have a WIOA presence with the flexibility of funding to start up new programs in an equal approach as opposed to 75% of the funding on the Out of School population. As the state grows more In School programs, our goal is to reduce the number of students dropping out. Additionally, for those students who do choose to drop out for varied family, personal, or financial reasons, we aim to support those students in alternative pathways to obtain a GED and stay connected to workforce activities. We believe this dual approach can reduce the overall number of disconnected youth in our state.

4. A discussion of how the waiver complements Department of Labor priorities (i.e. expansion of apprenticeship, improved employer engagement, etc.);

The waiver request complements Labor priorities as it will create a balanced approach to youth services by engaging more youth to stay in school and avoid disconnection to education and workforce systems. Youth at risk of dropping out typically have multiple barriers to education and/or employment, including low-income youth, young parents, homeless, previously incarcerated, and youth with disabilities, so serving this population aligns with Labor, state, and Workforce Development Board goals. Access to opportunities also encompasses technology and internet access, which many families do not have to

stay connected to education, and the Workforce Development Boards have already been providing this access prior to the pandemic but will leverage complementary grants to ensure students have the tools and supports to achieve their education and career goals.

The waiver aligns with Department of Labor priorities by promoting a more flexible allocation of funds, allowing for the expansion of career pathway and supportive youth programs, and enhancing employer engagement. This shift supports broader workforce development initiatives.

Specifically, this waiver request seeks to support students in the following:

- Supporting students to increase attendance in school and programming.
- Informing students of available supports and providing access to local supportive services such as access to technology or hardware, mental health, substance use, housing, basic needs, or other supports identified by need.
- Supporting and encouraging students in school and programming in order to show an increase in performance.

5. Quantifiable projected programmatic outcomes resulting from implementation of the waiver;

Projected outcomes include increased participation of in-school youth in WIOA programs, improved educational attainment rates, enhanced job readiness, and a reduction in the overall rate of youth disconnection. The approval of this waiver has the potential to prevent high school dropouts by providing mentorship and support services including mental health or substance use resources, intervention strategies, and technology access.

As we emerge from the pandemic, many students fell further behind or dropped out altogether. Connecticut Youth are facing mental health struggles at an alarming rate, and this impacts their ability to succeed in the classroom. To respond to these emerging issues, Connecticut proposes to focus a portion of its youth services on dropout prevention for in-school youth and to serve all at-risk youth, regardless of school status.

PY24 quantifiable goals:

Based on the individuals served, the regions will strive for:

- 65% of Participants will show an Increase School Attendance (defined as fewer reported unexcused absences in a determined time period).

- 60% Engagement in support services (defined using provided hardware/technology for engagement in services or a participant's pursuit of a referred support service such as mental health, substance use, or other supports).
- 60% Increase in a Grade Level Performance (defined as a reported improvement in a report card in a subject, overall grade point average improvement, or the improvement in education functioning level from a recognized assessment test).

6. Individuals, groups, or populations benefitting, or otherwise impacted by the waiver from the waiver;

This waiver is intended to benefit at-risk youth, regardless of school status, with an emphasis on youth at risk of dropping out of high school, GED, alternative, and post-secondary education programs.

7. How the state plans to monitor waiver implementation, including collection of measurable waiver outcome information;

CTDOL has comprehensive programmatic and fiscal monitoring procedures and a performance accountability system that measures and evaluates results for participants enrolled in WIOA programs. On a monthly and quarterly basis, CTDOL will review and analyze enrollment and service levels, program expenditures, and performance outcomes in coordination and collaboration with the regional Workforce Development Boards participating in the waiver. 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. These reviews include the Youth program strategies, services, and expenditure plans. The metrics outlined in this waiver request will be tracked by the Workforce Development Boards in the state's performance accountability system. Should this waiver request be granted, CTDOL will regularly monitor the impacts of this waiver authority to ensure appropriateness and effectiveness. Measurable Skills Gains will be reported when an education functioning level increase is increased or compliant attendance has continued for a full semester to define a milestone. CTDOL will report on the outcomes in the WIOA Annual Report.

- 8. Assurance of state posting of the request for public comment (including the dates that the state made the draft request available for public comment) and notification to affected local workforce development boards.**

The state assures transparency by posting the waiver request for public comment, specifying the dates of availability for public review. Affected local workforce development boards will be notified to ensure their input is considered in the decision-making process. Electronic copies of the waiver were sent via email to local boards and one-stop operators