U.S. Department of Labor

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

May 29, 2026

The Honorable Brian Kemp
Governor of Georgia
206 Washington St.
Suite 203
State Capitol
Atlanta, GA 30334

Dear Governor Kemp:

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 Georgia will meet the outcomes and implement the measures identified in its plan to ensure accountability agreed to by Georgia 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 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 Governor's reserve youth funds and local formula youth funds on out-of-school youth (OSY).

ETA Response: ETA approves for Program Years (PY) 2026 and 2027, which includes the entire time period for which states are authorized to spend each of those PY fund allotments, the State's request to waive the requirement that the State expend 75 percent of Governor's reserve youth funds on OSY. ETA reviewed the State's waiver request and plan and has determined that the requirements requested to be waived impede the ability of Georgia to implement its plan to improve the workforce development system. The State may lower the expenditure requirement of Governor's reserve funds to 50 percent for OSY.

In addition, ETA approves for PYs 2026 and 2027, which includes the entire time period for which states are authorized to spend each of those PY fund allotments, the State's request to waive the requirement that local areas expend 75 percent of local youth formula funds on OSY. The State may lower the local youth funds expenditure requirement to 50 percent for OSY. As a result of this waiver, ETA expects that the number of in-school youth (ISY) served will increase, and performance accountability outcomes for overall WIOA Youth (including both ISY and OSY) will remain steady or increase for the majority of the WIOA Youth performance indicators.

Requested Waiver: Waiver of the requirement that local youth programs make available each of the 14 youth programs 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 youth programs make available each of the 14 youth program elements listed in WIOA Section 129(c)(2) and 20 CFR 681.460. Under this approval, local areas are not required to make available all 14 program elements. ETA reviewed the State's request and plan and determined that the requirements requested to be waived impede the State's ability to implement its plan to improve youth workforce development service delivery.

Requested Waiver: Waiver associated with the requirement at WIOA Section 121(e) and 20 CFR 678.300(c) to establish and maintain a comprehensive American Job Center (AJC) in each of the State's local workforce development areas.

ETA Response: ETA approves, for PYs 2026 and 2027, the State's request to waive the requirement of WIOA Section 121(e), as described in 20 CFR 678.300(c), that a comprehensive AJC be established in each of the State's local workforce development areas. 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. Implementation may begin upon the State's fulfillment of the following conditions:

- Specify the local workforce development area(s) that will not have a comprehensive AJC; and
- Provide the reasoning and anticipated benefits behind the use of the alternative service delivery models, such as hub-and-spoke, affiliate sites, mobile units, or remote service technology, in contrast to the current service delivery approach for the purpose of enhancing access to services.

Requested Waiver: Waiver associated with the requirement at WIOA Section 121(d) and 20 CFR 678.800 that require one-stop centers to be certified in order to be eligible to receive funds.

ETA Response: This request falls outside of the Secretary's waiver authority and, therefore, cannot be approved. WIOA Section 189(i)(3)(A)(i) prohibits the Secretary from waiving requirements related to the funding of infrastructure costs for one-stop centers. However, please note that WIOA Section 121(g) establishes the authority and responsibility of the State Board "in consultation with chief elected officials and local boards" to establish the objective criteria and procedures for use by local boards in assessing the effectiveness, physical and programmatic accessibility, and continuous improvement of one-stop centers. ETA encourages Georgia to review the certification criteria and procedures to identify areas for improving the overall process and ensuring a minimally burdensome certification process. ETA is available to provide technical assistance to support the State in identifying improvements to create a certification process that is minimally burdensome to the State and local partners.

Additionally, as noted in Training and Employment Guidance Letter No. 05-25: *Maximizing Innovation in Workforce Innovation and Opportunity Act Programs*, under an approved Workforce Flexibility (Workflex) plan, waivers related to infrastructure agreements are allowable. If Georgia determines that State improvements to the one-stop center certification process are insufficient to address the issue, ETA can provide technical assistance regarding the potential benefits of Workflex and the requirements for developing a Workflex plan.

Requested Waiver: Waiver associated with the requirement at WIOA Section 121(h) and 20 CFR 678.700-678.755 that local workforce development areas establish, negotiate, and maintain infrastructure funding agreements with all required one-stop partners.

ETA Response: This request falls outside of the Secretary's waiver authority and, therefore, cannot be approved. WIOA Section 189(i)(3)(A)(i) prohibits the Secretary from waiving requirements related to the funding of infrastructure costs for one-stop centers, which would include requirements related to the infrastructure funding agreements that govern the sharing of infrastructure costs. However, as noted in Training and Employment Guidance Letter No. 05-25: *Maximizing Innovation in Workforce Innovation and Opportunity Act Programs*, under an approved Workforce Flexibility (Workflex) plan, waivers related to infrastructure agreements are allowable. ETA will provide technical assistance regarding the potential benefits of Workflex and the requirements for developing a Workflex 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: Karen Kirchler, Deputy Commissioner, Workforce Development, Technical College System of Georgia
Renata Adjibodou, Atlanta, GA, Regional Administrator, ETA
Latanya Lowery, Federal Project Officer, ETA

Current Narrative:

Georgia's currently approved waiver regarding the 75% Out-of-School Youth expenditure requirement is in effect for the full amount of time that the state has to spend PY23 funds (June 30, 2027). Georgia now seeks additional waivers for the Program Years covered by the 2024-2027 State Plan.

WAIVER REQUEST CONTINUATION #1: OUT-OF-SCHOOL YOUTH EXPENDITURE REQUIREMENT

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

WIOA Section 129(a)(4)(A) and 20 CFR 681.410, which states that the State and local areas expend 75% of Governor's reserve youth funds and local formula youth funds on out-of-school youth.

Actions the state has undertaken to remove state or local statutory or regulatory barriers:

Not applicable. No State or local barriers exist to implementing the proposed waiver.

State strategic goals and projected programmatic outcomes resulting from the implementation of the waiver

This waiver request is aligned with Georgia's stated goal of expanding the pool of available employees by including individuals with barriers to employment within the workforce system, as many of Georgia's local areas have experienced challenges with OSY recruitment and retention. OWD seeks an extension of the youth expenditure waiver to support the expansion of ISY programming for youth who are at risk of being disconnected from the education system and workforce. By implementing ISY programs, local areas are able to make connections with these youth prior to school dropout or other situations that may disconnect them from education and employment, eventually categorizing them as OSY. Particularly in the high-poverty counties of the state, early intervention is a key strategy to support positive personal and economic outcomes for youth. While Georgia recognizes the value and importance of WIOA's heightened emphasis on the alignment of programs that serve OSY in order to ensure they obtain the skills necessary to prepare for education achievement and workforce participation, it creates an undue burden for local areas who wish to provide quality ISY programming.

The desired programmatic outcomes from the implementation of this waiver remain the same, and include:

- The ability for LWDAs to strategically focus their allocated funds on an approach to better serve at-risk youth, while discouraging disconnection from education institutions. Specifically, LWDAs can fund a greater number of year-round and summer Work Experience activities targeting eligible ISY. Through these efforts, Georgia expects to see continued increase in graduation rates, and ideally, a statewide increase in the Measurable Skill Gains metric.
- The opportunity to provide support for ISY while equipping them with the academic and technical skills necessary to improve their employability. The expansion of ISY programs will strengthen the talent pipeline for employers, and therefore, reduce their training costs and employee turnover.

Alignment with department policy priorities

Continued implementation of Georgia's youth expenditure waiver will allow for more innovative and far-reaching programs to be developed at the local level to serve opportunity youth. As stated above, early intervention is a key strategy to ensuring these youth do not slip through the cracks. As highlighted in TEGL 9-22, the needs of youth participants are ever evolving, and this has only been further highlighted by the pandemic. Georgia seeks this waiver to stay ahead of the challenges and ensure local programming can pivot to adequately address the needs of WIOA-eligible youth in their communities, regardless of school status.

Individuals, groups, or populations affected by the waiver:

This wavier is intended to benefit youth by opening up additional avenues for local programming geared toward in-school and out-of-school youth. By increasing the flexibility afforded to local areas, local programs can reflect the needs of the community, particularly around dropout prevention. Workforce development partners, employers, parents, and school counselors will also benefit from the waiver by increasing the resources available to youth that will support their continued success in the realms of education and employment.

State plans for monitoring waiver implementation, including collection of waiver outcome information:

Youth funds under WIOA Title I are subject to various expenditure requirements. TCSG OWD will ensure regular checks of these requirements through a combination of FSR tracking, technical assistance, and annual monitoring reviews. These reviews are a joint endeavor between the Programs Team, Grants Team, and the Youth Services Lead to ensure a programmatic and financial focus on local operations. OWD reviews progress toward the required youth expenditures on a quarterly basis with the submission of the FSRs. Formal oversight of the requirements begins in the fall each year to allow enough time to intervene before the funding expires, but also to ensure OWD can capture progress toward the requirements from summer work experience programs.

In accordance with WIOA sec. 102(c)(3) and the implementing regulations, Georgia is submitting this waiver as part of the WIOA State Plan, which is subject to the requirements for public review and comment outlined in 20 CFR 676.130(d). Key stakeholders, such as LWDBs, are consulted prior to the submission of the State Plan regarding this waiver. It is important to note that this waiver has specifically been requested by the local areas, and they continue to support the State's request through the State Plan process. OWD regularly polls the local areas regarding how the waiver has impacted their performance outcomes, specifically Q2 and Q4 Youth Education and Employment, Credential Attainment, and Measurable Skill Gains. Additionally, Information about waiver outcomes is included annually in the WIOA Statewide Performance Narrative Report.

Outcomes and Results of Existing Waiver

OWD tracks the use of the waiver by LWDA and has seen more local areas implement additional youth-focused programming given the additional flexibility provided by the waiver. Currently, about half of the local areas are utilizing the waiver and have experienced an increase in In-School Youth participation by an average of 25%, as well as an increase in performance outcomes. The performance outcomes for Program Year 2025 are projected to maintain or increase across the following Youth measures: Q2 and Q4 Youth Education and Employment, Credential Attainment, and Measurable Skill Gains. For the most recent years for which we have completed performance data (PY23 and 24), nearly every LWDA utilizing the waiver saw increases in Q4 Youth Education and Employment, Credential Attainment, and Measurable Skill Gains. From a statewide perspective, OWD believes the implementation of the Youth Expenditure Waiver has contributed to the success of increasing performance across these measures as well. While the peak years of the pandemic saw dips in performance outcomes, there has been a steady increase across nearly all youth metrics since Program Year 2020. Most notably, the following statewide performance increases were identified in a review of the data:

Performance Measure	PY23
Q4 Youth Education/Employment	76.2%
Credential Attainment	68.0%
Measurable Skill Gains	58.0%

WIOA WAIVER REQUEST #2: WAIVE REQUIREMENT FOR LOCAL AREAS TO PROVIDE ALL 14 YOUTH PROGRAM ELEMENTS

The State of Georgia

The State of Georgia respectfully requests a waiver from the U.S. Department of Labor (USDOL) pursuant to Section 129(c)(2) of the Workforce Innovation and Opportunity Act (WIOA) and 20 CFR 681.460, which require local workforce development areas to make all fourteen (14) WIOA youth program elements available to eligible youth participants

Specifically, the waiver would support Georgia's efforts to focus greater funding on work-based learning opportunities, including paid and unpaid work experiences, pre-apprenticeships, and Registered Apprenticeships, beyond the statutory minimum 20 percent work experience expenditure requirement. In addition, the waiver would enable local areas to expand access to occupational skills training through Individual Training Accounts (ITAs), strengthening pathways to industry-recognized credentials and unsubsidized employment.

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

The State of Georgia requests a waiver of WIOA section 129(c)(2), which requires each local workforce development area (LWDA) to make all fourteen (14) WIOA Title I youth program elements available to eligible youth participants.

Approval of this waiver would provide local areas with flexibility to prioritize and concentrate resources on high-impact youth services, particularly paid and unpaid work experiences, occupational skills training, pre-apprenticeships, and Registered Apprenticeships, beyond the statutory minimum 20 percent work experience expenditure requirement. While local areas would not be required to make available all fourteen elements, youth would continue to have access to the full range of required services through referrals, coordination, and partnerships with required one-stop partners and other community-based providers.

Actions the state has undertaken to remove state or local statutory or regulatory barriers:

There are no state or local statutory or regulatory barriers that would prevent implementation of the requested waiver. Georgia's statutes, administrative rules, and WIOA policies are aligned with federal requirements and provide sufficient flexibility for local areas to implement the waiver, if approved.

The State has provided guidance and technical assistance to local workforce development areas emphasizing strategic youth service delivery, allowable expenditures, and performance accountability. Ongoing oversight and monitoring processes will remain in place to ensure continued compliance with federal requirements.

State strategic goal(s):

This waiver supports Georgia's strategic goals outlined in the WIOA/Perkins Combined State Plan, which is part of the broader *Top State for Talent* initiative. Georgia's statewide talent strategy focuses on aligning education, workforce development, and employer needs to prepare every Georgian for meaningful careers. Key goals include:

- Utilize sector partnerships to inform and guide strategic workforce development strategies and enhance partnership coordination.
- Develop a streamlined and regionally integrated workforce system that delivers efficient services to both businesses and individuals.
- Capitalize on the workforce system's strengths to create opportunities for all Georgia communities to prosper.
- Continuously align workforce and education system objectives to current and future occupational skill requirements.
- Expand the pool of available employees by increasing the participation of individuals with barriers to employment in the workforce system.

By allowing local areas to strategically prioritize youth program elements, Georgia seeks to better align youth services with employer demand, local workforce needs, and the statewide vision of preparing talent for real opportunities across the state.

Projected programmatic outcomes resulting from implementation of the waiver:

The implementation of this waiver, will allow Georgia to achieve the following outcomes:

- Increase work experience participation by redirecting resources from lower-impact program elements to work-based learning activities.
- Increase occupational skills training via individual training accounts
- Increase participation in pre-apprenticeships and Registered Apprenticeships as part of enhanced work-based learning strategies.

In addition, implementation of the waiver is expected to support increased emphasis on paid and unpaid work experiences, including pre-apprenticeships and Registered Apprenticeships. The waiver will also reduce administrative complexity for local areas, allowing staff to focus on participant engagement and service quality, provide greater flexibility for local areas to tailor youth services based on local labor market conditions and participant needs, and ensure that youth can access remaining program elements through partners, even where full coverage by local workforce areas is not required.

Alignment with Department policy priorities:

This waiver aligns with USDOL priorities which encourage the public workforce system to innovate, modernize operations, and use existing WIOA flexibilities to improve service delivery, advance work-based learning, and enhance outcomes for participants and employers. Specifically, the waiver supports the five strategic pillars:

- Industry-Driven Strategies: Focus resources on work experiences, occupational skills training, and apprenticeships that meet local employer needs and skill demands.
- Worker Mobility: Support youth in gaining credentials and career pathways that lead to sustainable employment and self-sufficiency.
- Integrated Systems: Ensure youth access all required program elements through coordinated services with partners, reducing duplication and administrative barriers.
- Accountability: Direct resources to high-impact services, monitor performance, and ensure public investments generate measurable results for youth and employers.
- Flexibility and Innovation: Allow local workforce areas the flexibility to concentrate resources on high-impact elements, respond to local labor market conditions, and align services with in-demand occupations.

Overall, the waiver enables Georgia to concentrate resources on high-impact services, improve alignment with employer demand, and enhance outcomes for youth with barriers to employment.

Individuals, groups, or populations affected by the waiver:

The waiver will primarily affect WIOA Title I youth participants, including both in-school and out-of-school youth. The waiver is expected to particularly benefit youth with barriers to employment including but not limited to low-income youth, youth who are basic skills deficient, youth with disabilities, youth experiencing foster care or homelessness, as well as local workforce boards, schools, and service providers.

By focusing resources on work-based learning and occupational training, the waiver will enhance opportunities for youth who require direct connections to employment and career pathways.

State plans for monitoring waiver implementation, including collection of waiver outcome information:

Georgia will monitor implementation of the waiver through existing WIOA oversight and accountability mechanisms, including:

- Review of local youth service strategies and expenditures during annual and on-site monitoring activities.
- Analysis of youth performance outcomes, including employment, credential attainment, and measurable skill gains.
- Ongoing technical assistance and training to local areas to ensure continued access to all required youth program elements through partnerships and referrals.
- Collection and evaluation of waiver-related outcome data to assess effectiveness and inform future policy decisions.

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

In accordance with WIOA Section 102(c)(3) and the WIOA regulations at 20 CFR 676.135, the State of Georgia is submitting this waiver request as part of its PY 2024-2027 WIOA Combined State Plan, which is subject to the requirements outlined in the WIOA regulations at 20 CFR 676.130(d) regarding public review and comment. These waiver requests were posted on the Technical College System of Georgia website for review and comment by key stakeholders, including all local Workforce Development Boards, businesses, and the general public, from January 15, 2026, through February 13, 2026.

WIOA WAIVER REQUEST #3: WAIVER OF THE REQUIREMENT TO ESTABLISH AND MAINTAIN A COMPREHENSIVE AMERICAN JOB CENTER (AJC) IN EACH OF THE STATE'S LOCAL WORKFORCE DEVELOPMENT AREAS.

The State of Georgia

The State of Georgia respectfully requests a waiver from the U.S. Department of Labor (USDOL) pursuant to Section 121(e) of the Workforce Innovation and Opportunity Act (WIOA) and 20 CFR 678.300(c), which require each local workforce development area (LWDA) to establish and maintain at least one comprehensive American Job Center (AJC).

This waiver would support Georgia's efforts to modernize workforce service delivery, expand access in rural and geographically dispersed areas, and ensure efficient use of public funds. The waiver would allow LWDAs to meet comprehensive service delivery expectations through a coordinated network of access points, affiliate sites, and technology-enabled services, while minimizing administrative costs and allowing the state to redirect funds toward direct participant services.

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

Georgia requests a waiver of the requirement to establish and maintain a physical comprehensive American Job Center (AJC) in each local workforce development area, as required under WIOA Section 121(e)(1) and its implementing regulation at 20 CFR 678.300(c). Georgia is requesting that LWDAs be allowed to meet comprehensive service delivery expectations through a coordinated network of access points, including affiliate sites and technology-enabled services, without being required to maintain a physical comprehensive AJC in each LWDA.

Actions the state has undertaken to remove state or local statutory or regulatory barriers:

There are no state or local statutory or regulatory barriers that would prevent implementation of the requested waiver. The state has provided flexibility to LWDAs to design service delivery strategies that leverage existing community infrastructure, including technical colleges and partner facilities.

Georgia has also supported technology-enabled service delivery, including the provision of Wagner-Peyser Employment Services through a blended model. This approach combines in-person Employment Services delivered at affiliate locations and one-stop centers with virtual service options, including live chat and Employment Virtual Agent (EVA) kiosks. In addition, the state has encouraged flexibility in local Memoranda of Understanding and Infrastructure Funding Agreements to accommodate non-traditional service delivery arrangements while maintaining accountability and compliance with federal requirements.

State strategic goal(s):

This waiver supports Georgia's strategic goals outlined in the WIOA/Perkins Combined State Plan, which is part of the broader *Top State for Talent* initiative. Georgia's statewide talent strategy focuses on aligning education, workforce development, and employer needs to prepare every Georgian for meaningful careers.

Key strategic goals supported by this waiver include:

- Expand access to workforce services statewide, including those in rural and geographically dispersed areas.
- Reduce administrative and facility costs by allowing LWDAs to use flexible and innovative service delivery approaches.
- Strengthen participant and employer engagement by ensuring workforce programs are responsive to local labor market needs.
- Support workforce system innovation and adaptability so that LWDAs can tailor services to evolving labor market demands and regional priorities.

By allowing flexibility in how comprehensive services are delivered, this waiver enables Georgia to expand access to workforce services, particularly in rural and underserved regions, while ensuring that services remain customer-centered, coordinated, and aligned with regional labor market needs.

Projected programmatic outcomes resulting from implementation of the waiver:

Implementation of this waiver is expected to result in measurable programmatic benefits that improve service reach and efficiency. Projected outcomes include:

- Increase access to workforce services through a network of affiliate sites, virtual services, and other coordinated access points.

- More efficient use of infrastructure and administrative funding, allowing greater investment in career services, training, and employer engagement.
- Improve engagement among individuals and employers who face geographic or transportation barriers.
- Maintain WIOA performance outcomes that are comparable to, or exceed, outcomes achieved through comprehensive physical AJCs.
- Enhance local flexibility and innovation allowing LWDAs to tailor service delivery models to the needs of participants and employers, local labor market needs, and regional priorities.

The waiver is also expected to reduce fixed facility costs in underutilized locations and allow local areas to redirect resources toward direct participant services and employer-focused strategies.

Alignment with Department policy priorities:

This waiver aligns with U.S. Department of Labor policy priorities by promoting innovation and modernization in workforce service delivery while maintaining accountability and performance integrity. The waiver supports expanded access to services, strengthens coordination across workforce and education systems, and encourages efficient use of public resources. Specifically, the waiver supports the five strategic pillars:

- **Industry-Driven Strategies:** Support sector partnerships and regional strategies that align training, education, and workforce development with employer demand.
- **Worker Mobility:** Increase participation of individuals with barriers to employment by reducing geographic, transportation, and infrastructure limitations.
- **Integrated Systems:** Minimize administrative and facility costs, redirecting funds to career services, training, and employer engagement.
- **Accountability:** Maintain WIOA performance standards through monitoring, reporting, and continuous improvement using local plans, MOUs, IFAs, and performance indicators.
- **Flexibility and Innovation:** Enable LWDAs to design service models leveraging technical colleges, partner facilities, and virtual platforms.

This waiver allows Georgia to provide workforce services that are flexible, accessible, and tailored to local needs. By combining physical centers, affiliate sites, and virtual options, the state can reach more job seekers, use resources more efficiently, and better match workforce programs to local labor market demands, benefiting both workers and employers.

Individuals, groups, or populations affected by the waiver:

Individuals and entities affected by this waiver include job seekers and employers located in rural or geographically dispersed LWDAs, particularly those who experience transportation or distance-related barriers to accessing centralized physical facilities. LWDAs and workforce system partners may also be affected by the increased flexibility to design service delivery models that reflect regional needs. All affected individuals will continue to have meaningful access to required workforce services through coordinated partner networks and virtual service delivery options.

<u>State plans for monitoring waiver implementation, including collection of waiver outcome information:</u>

Georgia will monitor implementation of this waiver through oversight by the State Workforce Development Board, in consultation with the Chief Elected Officials (CLEO), and ongoing review of local service delivery strategies as documented in local plans and MOUs.

In addition, the state will continue to review all sites during the annual monitoring process to ensure compliance with WIOA requirements. The state will also analyze WIOA primary indicators of performance to assess the impact of the waiver on participant and employer outcomes and will continue to monitor accessibility and equal opportunity compliance. Information on service utilization, performance outcomes, and customer feedback will be collected and reported through established WIOA annual reporting processes and used to support continuous improvement.

<u>Assurance of state posting of the request for public comment and notification to affected local workforce development boards:</u>

In accordance with WIOA Section 102(c)(3) and the WIOA regulations at 20 CFR 676.135, the State of Georgia is submitting this waiver request as part of its PY 2024-2027 WIOA Combined State Plan, which is subject to the requirements outlined in the WIOA regulations at 20 CFR 676.130(d) regarding public review and comment. These waiver requests were posted on the Technical College System of Georgia website for review and comment by key stakeholders, including all Local Workforce Development Boards, businesses, and the general public, from January 15, 2026, through February 13, 2026.

WIOA WAIVER REQUEST #4: WAIVER OF THE REQUIREMENT TO FORMALLY CERTIFY AFFILIATE ONE-STOP CENTERS

The State of Georgia

The State of Georgia respectfully requests a waiver from the U.S. Department of Labor (USDOL) pursuant to Section 121(d) of the Workforce Innovation and Opportunity Act (WIOA) and 20 CFR 678.800, which require Affiliate One-Stop Centers to be formally certified to ensure consistency and compliance with One-Stop standards.

Approval of this waiver would reduce administrative burden, support a more efficient and responsive service delivery system, and provide local workforce development areas (LWDAs) with flexibility to operate Affiliate One-Stop Centers in a manner that maintains quality and accessibility without the disproportionate administrative requirements of formal certification.

<u>The statutory and/or regulatory requirements the state would like to waive:</u>

Georgia requests a waiver of the requirement under WIOA Section 121(d) and 20 CFR 678.800 that Affiliate One-Stop Centers undergo formal certification. While certification is intended to ensure quality and consistency across the One-Stop system, it has resulted in a significant administrative burden relative to the scope of services typically provided at these locations. The process demands substantial staff time devoted to documentation, monitoring, and review activities that do not directly enhance service delivery or customer access.

This waiver is limited in scope to the formal certification process for Affiliate One-Stops. The State does not seek relief from any other WIOA statutory or regulatory requirements, including required partner participation, accessibility standards, nondiscrimination obligations under WIOA Section 188, service coordination, or performance accountability. All required programs and services will continue to be delivered at Affiliate One-Stop sites.

Actions the state has undertaken to remove state or local statutory or regulatory barriers:

There are no state or local statutory or regulatory barriers preventing the implementation of this waiver. Georgia has provided LWDAs with guidance and flexibility to structure Affiliate One-Stop Centers to meet regional and community needs while ensuring compliance with all applicable WIOA requirements.

State strategic goal(s):

This waiver supports strategic goals outlined in Georgia's WIOA/Perkins Combined State Plan and the broader *Top State for Talent* initiative. The statewide talent strategy focuses on aligning education, workforce development, and employer needs to prepare all Georgians for meaningful careers.

Key strategic goals supported by this waiver include:

- Encourage LWDAs to establish additional Affiliate One-Stop Centers in community and partner locations that currently do not pursue designation due to certification burden.
- Support flexible service delivery through community and partner facilities such as technical colleges and other partner locations, without requiring formal certification.
- Increase the number of access points for individuals to enter the workforce system, particularly in rural or geographically dispersed areas, through Affiliate One-Stop Centers.
- Reduce administrative burden associated with formal certification of Affiliate One-Stop Centers, allowing local staff and partners to focus on service delivery, referrals, partner coordination, and employer engagement rather than documentation, monitoring, and review activities.

By providing this flexibility, the waiver enables LWDAs to operate an integrated and responsive workforce system that meets regional needs while maximizing operational efficiency.

Projected programmatic outcomes resulting from implementation of the waiver:

Implementation of this waiver is expected to result in measurable programmatic benefits, including:

- Enhance flexibility for LWDAs to deploy services in innovative ways tailored to local labor market needs.
- Increase staff capacity to focus on direct participant services, employer engagement, and performance outcomes.
- Sustain and improve access to WIOA services at affiliate sites and through virtual platforms.
- Maintain or improve WIOA performance outcomes at both the local and state levels.

- Reduce administrative time and costs associated with documenting, monitoring, and reviewing Affiliate One-Stop certification.

The waiver is also expected to reduce unnecessary duplication of administrative work, allowing local areas to redirect resources toward career services, training, and employer-focused strategies.

Alignment with Department policy priorities:

This waiver aligns with U.S. Department of Labor policy priorities by promoting modernization, efficiency, and customer-centered service delivery while maintaining accountability and performance integrity. Specifically, the waiver supports the five strategic pillars:

- **Industry-Driven Strategies:** Redirects resources toward aligning services with employer and industry needs.
- **Worker Mobility:** Expands access to services for individuals with barriers to employment, including those in rural or remote areas.
- **Integrated Systems:** Reduces administrative and monitoring overhead, redirecting resources to service delivery.
- **Accountability:** WIOA performance outcomes will continue to be monitored through local plans, MOUs, and performance indicators.
- **Flexibility and Innovation:** Provides LWDAs the ability to implement innovative service models at Affiliate One-Stops, including blended and virtual delivery approaches without formal certification.

This waiver allows Georgia to maintain a robust, high-quality workforce system while increasing operational flexibility and efficiency.

Individuals, groups, or populations affected by the waiver:

Individuals and groups affected by this waiver include job seekers and employers accessing services through Affiliate One-Stop locations, particularly those in rural, remote, or geographically dispersed communities where affiliate sites often serve as critical access points.

The waiver also affects LWDAs and required partners by reducing administrative burden and allowing staff to focus on activities that directly support service delivery, employer engagement, and performance outcomes.

State plans for monitoring waiver implementation, including collection of waiver outcome information:

Georgia will monitor implementation of this waiver through oversight by the State Workforce Development Board, in consultation with the Chief Elected Officials (CLEO), and ongoing review of local service delivery strategies as documented in local plans and MOUs.

In addition, the state will continue to review all sites during the annual monitoring process to ensure compliance with WIOA requirements. The state will also analyze WIOA primary indicators of performance to assess the impact of the waiver on participant and employer outcomes and will continue to monitor accessibility and equal opportunity compliance. Information on service utilization, performance outcomes, and customer feedback will be collected and reported through established WIOA annual reporting processes and used to support continuous improvement.

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

In accordance with WIOA Section 102(c)(3) and the WIOA regulations at 20 CFR 676.135, the State of Georgia is submitting this waiver request as part of its PY 2024-2027 WIOA Combined State Plan, which is subject to the requirements outlined in the WIOA regulations at 20 CFR 676.130(d) regarding public review and comment. These waiver requests were posted on the Technical College System of Georgia website for review and comment by key stakeholders, including all local Workforce Development Boards, businesses, and the general public, from January 15, 2026, through February 13, 2026.

WIOA WAIVER REQUEST #5: WAIVER OF THE REQUIREMENT TO ESTABLISH AND MAINTAIN INFRASTRUCTURE FUNDING AGREEMENTS (IFAs) FOR ALL REQUIRED ONE-STOP PARTNERS

The State of Georgia

The State of Georgia respectfully requests a waiver from the U.S. Department of Labor (USDOL) pursuant to Section 121(h) of the Workforce Innovation and Opportunity Act (WIOA) and the implementing regulations at 20 CFR 678.700-678.755, which require local workforce development areas (LWDAs) to establish, negotiate, and maintain formal Infrastructure Funding Agreements (IFAs) with all required One-Stop partners.

Approval of this waiver would reduce administrative burden for LWDAs and required One-Stop partners, promote continued and increased partner participation in the One-Stop delivery system, support flexible and sustainable local operations, and provide LWDAs with discretion to cover shared infrastructure costs through alternative, locally determined approaches without requiring formal cost-sharing contributions from all required partners.

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

Georgia requests a waiver of the requirement under WIOA Section 121(h) and 20 CFR 678.700-678.755 to establish and maintain formal IFAs with all required One-Stop Partners. These regulations govern the negotiation, execution, and collection of partner contributions to shared infrastructure costs.

Although the purpose of IFAs is to ensure all required partners contribute fairly toward infrastructure costs, the requirement has resulted in significant administrative burden for LWDAs and required partners. This burden is especially acute for partners facing declining funding, who may be discouraged from fully engaging in service delivery due to the substantial time and financial commitment required to develop, negotiate, and administer IFAs.

This waiver is limited in scope to the formal IFA process. The State does not seek relief from any other WIOA statutory or regulatory requirements, including partner participation in One-Stop Centers, service coordination, accessibility standards, nondiscrimination obligations under WIOA Section 188, or performance accountability. All required services will remain available to job seekers and employers through coordinated service delivery arrangements.

Actions the state has undertaken to remove state or local statutory or regulatory barriers:

There are no state or local statutory or regulatory barriers preventing the implementation of this waiver. Georgia has provided flexibility to LWDAs to develop service delivery strategies leveraging existing community infrastructure, including technical colleges, partner facilities, and virtual service delivery options.

The state has encouraged the use of blended models, combining in-person services with virtual services, such as Employment Virtual Agent (EVA) kiosks, and technology-enabled tools. Additionally, local boards have been provided guidance on negotiating Memoranda of Understanding (MOUs) that allow for flexible cost-sharing arrangements consistent with partner capacity. These efforts reduce administrative burden while maintaining system sustainability and accountability.

State strategic goal(s):

This waiver supports strategic goals outlined in Georgia's WIOA/Perkins Combined State Plan as part of the broader *Top State for Talent* initiative, which aims to align workforce development, education, and employer needs to prepare Georgians for meaningful careers.

Key strategic goals include:

- Preserve and strengthen partner participation in the One-Stop system by removing financial and administrative barriers that may discourage continued engagement, particularly for partners with declining funding or limited administrative capacity.
- Provide LWDAs with discretion to assume infrastructure costs or use alternative funding strategies when doing so best supports local system stability.
- Enable locally tailored service delivery models that reflect regional labor market conditions, geographic realities, and partner capacity.
- Ensure sustainable One-Stop operations while prioritizing direct services to job seekers and employers.
- Reduce administrative burden on LWDAs and required One-Stop partners to allow more resources to be devoted to direct participant services, partner coordination, and employer engagement.

By allowing flexibility in infrastructure funding, this waiver promotes efficient and effective operations that support high-quality, customer-centered workforce services.

Projected programmatic outcomes resulting from implementation of the waiver:

Implementation of this waiver is expected to produce measurable programmatic benefits, including:

- Improve retention and engagement of required One-Stop partners who may otherwise withdraw due to cost-sharing or administrative requirements.
- Increase staff capacity to focus on service delivery, employer engagement, and system coordination.
- Greater local flexibility to maintain One-Stop infrastructure despite partner funding instability.
- Maintenance or improvement of WIOA performance outcomes compared to areas operating under traditional IFA requirements.
- Reduce administrative time and costs associated with formal IFA negotiation, execution, monitoring, and collection of partner contributions.

The waiver also provides flexibility to redirect resources from administrative overhead to career services, training, and employer-focused strategies.

Alignment with Department policy priorities:

This waiver aligns with USDOL policy priorities by supporting innovation, flexibility, and efficiency in workforce service delivery, while maintaining accountability. Specifically, it addresses the five strategic pillars:

- **Industry-Driven Strategies:** Allows LWDAs to prioritize employer engagement and aligning programs with employer needs, rather than on administrative negotiations.
- **Worker Mobility:** Frees resources to expand access to services for individuals struggling to find high-wage jobs.
- **Integrated Systems:** Reduces administrative overhead and rigid financial requirements while improving service delivery.
- **Accountability:** Maintains oversight through local plans, MOUs, certification processes, and WIOA performance reporting
- **Flexibility and Innovation:** Enables local boards to implement innovative, locally tailored approaches for covering shared infrastructure costs.

This waiver allows Georgia to operate a workforce system that is sustainable, efficient, and responsive to local needs.

Individuals, groups, or populations affected by the waiver:

Individuals and entities affected by this waiver include required One-Stop partners, who benefit from reduced administrative and financial burden while continuing to provide services; LWDAs that gain flexibility in managing infrastructure costs; and job seekers and employers in all LWDAs, who will experience increase access to services as staff time and resources are redirected to support participants and employers more effectively.

State plans for monitoring waiver implementation, including collection of waiver outcome information:

Georgia will monitor implementation of this waiver through oversight by the State Workforce Development Board, in consultation with the Chief Elected Officials (CLEO), and ongoing review of local service delivery strategies as documented in local plans and MOUs.

In addition, the state will continue to review all sites during the annual monitoring process to ensure compliance with WIOA requirements. The state will also analyze WIOA primary indicators of performance to assess the impact of the waiver on participant and employer outcomes and will continue to monitor accessibility and equal opportunity compliance. Information on service utilization, performance outcomes, and customer feedback will be collected and reported through established WIOA annual reporting processes and used to support continuous improvement.

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

In accordance with WIOA Section 102(c)(3) and the WIOA regulations at 20 CFR 676.135, the State of Georgia is submitting this waiver request as part of its PY 2024-2027 WIOA Combined State Plan, which is subject to the requirements outlined in the WIOA regulations at 20 CFR 676.130(d) regarding public review and comment. These waiver requests were posted on the Technical College System of Georgia website for review and comment by key stakeholders, including all local Workforce Development Boards, businesses, and the general public, from January 15, 2026, through February 13, 2026.

April 1, 2026

USDOL ETA, Region 3
61 Forsyth St SW
Atlanta, GA 30303

Dear ETA Leadership,

In response to the request for additional information received from the U.S. Department of Labor's Employment and Training Administration on March 24, 2026, the Technical College System of Georgia (TCSG), Office of Workforce Development (OWD), is submitting the following supplemental information regarding the waivers included in the Combined State Plan modification submitted through the State Plan Portal. The requested information is provided below.

1. **Waiver Request #1. 75% OSY Expenditure**
    a. *Please provide confirmation of local board notification and public comment for this specific waiver.*
        i. Georgia provided notification of this waiver request to Local Workforce Development Areas (LWDAS) through direct email communication during the State Plan development process. The waiver was also included in the State Plan package that was made available for public review and comment for a period of 30 days, from January 15 through February 13, 2026. During this process, local boards and other stakeholders had the opportunity to review and provide comments on the continuation of the Out-of-School Youth expenditure waiver request. No public comments were received despite the State Plan being posted on the TCSG website and inclusion of this waiver in State Workforce Development Board subcommittees and regular communications with stakeholders at both the state and local levels.

    b. *Please provide the exact expenditure rate(s) that you are proposing to reduce the 75% OSY expenditure to, for both 1) statewide and 2) local area funds.*
        i. Georgia requests approval to reduce the minimum out-of-school youth expenditure requirement from 75 percent to 50 percent for both statewide and local areas funds.

    c. *Regarding performance measures, it appears that credential attainment decreased from PY23 to PY24. If this is accurate, please explain the reasons for this decrease and explain how GA will mitigate the risk and ensure maintenance/increase of this measure.*

i. The decrease in credential attainment from PY23 to PY24 appears largely attributable to the exit of a large number of participants at the local level who could no longer be contacted. Program Monitoring identified long-term inactive case files at the local level as a key issue. In response, OWD updated the policy on participation and exit to provide clearer guidance on addressing loss of contact during follow-up Services. Many local area participants were unable to complete their training, and contact was lost with their case managers. As a result, local areas may have closed a higher number of these "inactive" or "dead" cases than usual to align with the updated policy. While this may have caused a short-term impact, these changes are expected to support greater credential attainment outcomes moving forward. To further mitigate risk, Georgia clarified the definition of participant "Suitability" to strengthen upfront training decisions and prevent inactive cases. Additionally, OWD provided targeted online training for local staff on improving credential attainment and crafting individualized employment plans, equipping both new and experienced staff with strategies to enhance outcomes.

d. Please provide a table comparing prior waiver goals to actual outcomes. Please also provide more specific information demonstrating how ISY enrollments and programs have been positively impacted in prior waiver years.

Prior Goals (PY 22-24)	Outcomes
Allow LWDAs to strategically use funds to serve at-risk youth by expanding year-round and summer work experiences for ISY, reducing disconnection from education. Through these efforts, Georgia expects to see continued increase in graduation rates, and ideally, a statewide increase in the Measurable Skill Gains metric.	The MSG rate has seen consistent improvement over the years, from 55% in PY22 to 58% in PY23 and 63.5% in PY24. This upward trend reflects sustained progress toward improving participant outcomes and indicates that expanded work-based learning opportunities are contributing to measurable academic and skill advancement.
The opportunity to provide support for ISY while equipping them with the academic and technical skills necessary to improve their employability. The expansion of ISY programs will strengthen the talent	MSG rates continue to increase and credential attainment remained at 68% in PY22 and PY23 and is expected to increase despite the slight decrease to 62.6% in PY24. From PY20 to PY25, total youth program funding in

pipeline for employers, and therefore, reduce their training costs and employee turnover	Georgia has declined by approximately 26%.Year-over-year reductions include 9.44% in PY21, 8.99% in PY22, 8.57% in PY23, 0.56% in PY24, and 1.56% in PY25. Despite these funding reductions, the state has maintained strong program outcomes for youth.

Georgia's prior waiver goals centered on increasing flexibility for local areas, expanding early intervention for at-risk youth, strengthening ISY programming, and supporting improved youth outcomes. Actual implementation results indicate that the waiver has advanced these objectives. Approximately half of local areas have used the waiver flexibility, and among those areas Georgia observed an average 25 percent increase in In-School Youth participation. Local areas also reported expanded use of year-round and summer work experience models for ISY, allowing youth to build employability skills, remain attached to school, and access career exposure earlier.

e. *Please provide information on the technical assistance that has been provided to local areas that have experienced challenges with recruiting OSY.*
    i. The recruiting challenges that most LWDA report stem from the difficulty in serving OSY individuals who are low-income and have a high school diploma but do not meet other WIOA eligibility criteria. Recognizing the need to increase OSY enrollment from other groups, such as individuals with disabilities, those experiencing homelessness, or youth in foster care, OWD remains committed to providing and strengthening technical assistance to LWDAs facing recruitment challenges. State staff have provided guidance to clarify eligibility criteria, including which combinations of income, educational attainment, and other barriers meet standard OSY eligibility. Local areas have also received support in identifying alternative recruitment strategies, such as partnering with community organizations that serve out-of-school youth, and guidance on strategically using the 5% exception when resources allow. This assistance has been delivered through webinars, individualized guidance, and follow-up communication to address specific recruitment challenges and share best practices. Specific examples include efforts to increase co-enrollment of participants with Title II Adult Education through a co-enrollment pilot, which included trainings on eligibility, cross-title MSG

tracking, and other best practices. State staff have also provided ongoing trainings on using state-funded virtual work experiences through CareerRise. For 2026, the Programs Team will implement in-person trainings across Georgia on topics such as attracting and retaining participants, pre-apprenticeships, and reinforcing knowledge of current WIOA policy guidance and program tools available via the WorkSource GA portal and past trainings. These efforts demonstrate a structured and systematic approach to supporting LWDAs in increasing OSY enrollment across the state.

f. *Please provide an explanation of how GA plans to reduce future reliance on this OSY waiver.*

    i. Georgia is requesting this waiver to allow flexibility to better serve in-school youth, particularly those at risk of disconnection from education and employment. This flexibility supports increased access to work-based learning, occupational skills training, and supportive services that improve educational attainment and workforce readiness. To reduce future reliance on the waiver, Georgia will continue to strengthen overall youth service delivery by expanding partnerships with education and workforce partners, providing technical assistance to LWDAs on youth program design and service delivery strategies, and identifying and sharing promising practices that improve youth engagement and outcomes.

    Some of these initiatives include statewide Youth Roundtables, a series of in-person training sessions conducted across Georgia from October through November focused on strengthening local capacity to serve youth. These sessions help local areas implement effective youth programs and coordinate services with other funding sources, reducing the need to shift WIOA OSY funds to support ISY. In addition, Georgia continues to strengthen the alignment between workforce and education through the State's implementation of the Combined State Plan and the focus on youth participation in Perkins V Career, Technical, and Agricultural Education (CTAE) pathways. By engaging in-school youth in structured pathways that include work-based learning and credential attainment, less resources are needed from WIOA to help youth stay in school.

    Furthermore, Georgia continues to expand work-based learning opportunities to better connect youth to career pathways. OWD has partnered with CareerRise to develop and implement a five-week virtual work experience program that provides participants with work readiness skill development, career exploration, and virtual job shadowing opportunities. This program helps meet measurable skill gain and employment goals without relying on OSY-designated funds.

Georgia is also strengthening connections to apprenticeship opportunities by supporting the development of a pre-apprenticeship framework to prepare youth for entry into Registered Apprenticeships. The onboarding of a pre-apprenticeship coordinator ensures the framework is implemented effectively and facilitates communication between employers, LWDAs, and participants.

While these initiatives are underway, Georgia believes continued waiver authority remains necessary to provide local areas the flexibility to serve both ISY and OSY effectively based on local conditions and youth needs.

2. **Waiver Request #2. 14 Youth Program Elements**
   a. *The projected programmatic outcomes for this waiver do not include quantifiable targets. Please provide the quantifiable targets for the following indicators. (Note that linking to WIOA performance indicators is preferred.)*
      i. *Increase work experience participation by redirecting resources from lower-impact program elements to work-based learning activities.*
      ii. *Increase occupational skills training via individual training accounts*
      iii. *Increase participation in pre-apprenticeships and Registered Apprenticeships as part of enhanced work-based learning strategies.*

Regarding projected outcomes and quantifiable targets under this waiver, it is important to consider that youth program funding has declined approximately 26 percent from PY20 to PY25, including a most recent reduction of 1.56 percent in PY25. Despite these reductions, the state's strategy is to maintain current service levels, which we consider a success given the budget constraints – see table below. This approach allows local areas to continue serving participants effectively, focusing on elements more closely connected to youth employment and skill development.

Service Type	Current PY25 Enrollments (as of 04/01.2026)
Work Experience (WEx)	765
Occupational Skills Training	282
Pre-Apprenticeship	12

These current enrollment levels provide a baseline for the waiver's programmatic outcomes. The waiver allows local areas to redirect resources from lower-impact elements toward strategies with the greatest impact. For work experience, the goal is to maintain youth participation in year-round and summer activities, aligning with WIOA Youth Measurable Skill Gains and placement in Employment or Education indicators. For occupational skills training, the target is to sustain current enrollment in programs leading to recognized credentials, consistent with the WIOA Credential Attainment indicator. For pre-apprenticeships, the goal is to maintain current participation levels, consistent with WIOA program elements, while also supporting youth transition into registered apprenticeships. Outcomes for pre-apprenticeships will be measured through enrollment and completion in alignment with WIOA performance metrics. Registered apprenticeships are not a required WIOA youth program element, but supporting participation in them can enhance skill development and employment pathways for youth

In summary, by maintaining service levels despite a 26 percent funding reduction, this waiver supports the strategic focus on high-impact, work-based learning activities, ensuring continuity of services and positive outcomes for youth participants

3. **Waiver Request #3. Comprehensive AJC in Each of State's LWDA**
    a. *Please identify the specific local areas that would benefit from this waiver and provide an explanation why.*
        i. The State of Georgia intends to make this waiver available to all Local Workforce Development Areas. At this time, the State cannot predetermine which specific LWDAs will elect to request and implement the waiver, as these decisions will be made at the local level based on each area's service delivery needs, local leadership, infrastructure considerations, and regional needs. The State anticipates that LWDAs covering rural and geographically large areas, particularly those spanning multiple counties with lower population density, may be well-positioned to benefit from the flexibility provided under this waiver. Additionally, LWDAs within the metropolitan Atlanta region may also benefit, as service demand, transportation challenges, and the physical separation between local areas can present barriers to accessing a single centralized comprehensive AJC.

           To ensure a consistent and accountable approach, the Office of Workforce Development will establish a formal process through which

LWDAs may request approval to operate without a comprehensive AJC. This process will require local board action and submission of a request that includes justification for the proposed service delivery model, as well as a description of how all required WIOA services will continue to be provided. LWDAs will also be required to demonstrate how individuals, including those with barriers to employment, will maintain meaningful access to services under the proposed approach. Requests will be reviewed by the State for alignment with WIOA requirements prior to approval, and implementation will be subject to ongoing monitoring through existing oversight mechanisms, including local plan review and annual monitoring activities.

b. *Please identify the services that would no longer be available at the existing comprehensive AJCs with this waiver. Please describe how these particular services will be made available in the local workforce area differently and how these proposed alternatively delivery approaches can similarly address the full spectrum of community workforce needs.*

    i. All LWDAs will continue to provide the full range of required career, training, and employer services. Consistent with the USDOL guidance for this waiver, because implementation will be determined by each LWDA, the State cannot at this time specify which services, if any, would no longer be provided at a physical comprehensive AJC. Decisions regarding service delivery will depend on the unique needs, infrastructure, and strategies of each LWDA that elects to request the waiver.

    In place of a comprehensive physical AJC, LWDAs will deliver all required services through alternative approaches, including affiliate sites, partner facilities such as technical colleges or community-based organizations, and technology-enabled virtual platforms. These alternative methods are intended to similarly address the full spectrum of workforce services that would be expected of a physical comprehensive AJC, while improving accessibility for participants and employers, particularly in rural or geographically dispersed areas. The State will review each LWDA's service delivery plan and monitor implementation to ensure continued compliance with WIOA requirements and that the local workforce system meets the needs of all participants and employers.

c. *Please confirm whether, and how, GA will be able to track cost savings/increased funding going to services if this waiver is approved, and describe how these cost* *changes will be tracked (such as through changes in access, service utilization, and performance by location) on an annual basis.*

i. The State will utilize existing WIOA reporting, financial oversight, and monitoring processes to assess the impact of this waiver. This includes ongoing review of expenditure patterns, service utilization, and performance outcomes through established reporting mechanisms. Any LWDA approved for a waiver will undergo a specific expense audit to establish baseline costs, which will serve as a reference point for comparative analysis over time. Given that implementation will vary by LWDA, the State's approach will focus on identifying trends over time and assessing how local service delivery models evolve. Information gathered through local plans, monitoring reviews, and annual performance reporting will inform the State's understanding of how resources are being utilized and how access to services is affected.

d. *Please provide quantifiable targets for the projected outcomes provided:*

i. *Increase access to workforce services through a network of affiliate sites, virtual services, and other coordinated access points.*

ii. *More efficient use of infrastructure and administrative funding, allowing greater investment in career services, training, and employer engagement.*

iii. *Improve engagement among individuals and employers who face geographic or transportation barriers.*

iv. *Maintain WIOA performance outcomes that are comparable to, or exceed, outcomes achieved through comprehensive physical AJCs.*

v. *Enhance local flexibility and innovation allowing LWDAs to tailor service delivery models to the needs of participants and employers, local labor market needs, and regional priorities*

Georgia appreciates the emphasis on measurable outcomes and remains committed to ensuring that this waiver supports improved access, efficiency, and service delivery across the workforce system. However, because this waiver is optional, locally driven, and designed to support a range of service delivery models across diverse LWDAs, the State does not currently have a sufficient baseline to establish uniform, statewide quantifiable targets specific to this waiver. The impact of the waiver will depend on the number and type of LWDAs that elect to implement it, as well as the specific strategies they employ.

This waiver authority was provided to encourage flexibility and innovation in workforce service delivery, and the State's approach reflects that intent by allowing LWDAs to tailor models to their unique geographic and economic conditions. At this time, the State expects that implementation of the waiver will result in expanded access to workforce services, more efficient use of infrastructure funding, improved engagement of individuals and employers facing geographic or transportation barriers, and maintenance of WIOA primary indicators of performance at levels comparable to or exceeding current outcomes.

Rather than establishing fixed numerical targets in advance, the State will rely on existing WIOA primary indicators of performance, along with analysis of service utilization and access, to evaluate the effectiveness of the waiver over time. As additional data becomes available through implementation, the State will assess outcomes and determine whether more specific benchmarks are appropriate in future planning and reporting cycles.

4. **Waiver Request #4. Formal Certification of Affiliate One-Stop Centers**
   a. *Please provide additional clarification regarding the intent of this waiver.*

   For instance, is the intent of this waiver to require affiliate one-stops to comply only with certain certification requirements, to waive all standards so that affiliate one-stop centers do not need to comply with any of the certification standards, or to waive only the formal certification process (while requiring affiliates to comply with all requirements in practice)? Additional information on the specific intent of this waiver is needed to assess this request.

   The intent of Waiver Request #4 is to waive **only the formal certification process** for Affiliate One-Stop Centers, while ensuring that all substantive WIOA requirements continue to be met in practice. This waiver does not remove or reduce any standards. Affiliate One-Stop Centers will continue to comply with all statutory and regulatory obligations, including required partner participation, accessibility standards, nondiscrimination obligations under WIOA Section 188, service coordination, and performance accountability.

   The scope of the waiver is limited solely to the administrative process of formal certification under WIOA Section 121(d) and 20 CFR 678.800. By eliminating the requirement for formal documentation, monitoring, and review for certification purposes, LWDAs can reduce staff time devoted to documentation, monitoring, and review activities that do not directly enhance service delivery or customer outcomes. Affiliate sites will continue to provide all required WIOA services and maintain accountability for performance outcomes.

The State of Georgia will monitor implementation of this waiver through existing oversight mechanisms, including local plans, MOUs, annual monitoring, and review of performance indicators. This approach allows LWDAs to redirect staff time and resources toward direct service delivery, employer engagement, and participant outcomes, while preserving the accessibility and quality of workforce services.