U.S. Department of Labor

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

June 23, 2026

The Honorable Brad Little
Governor of Idaho
State Capitol
PO Box 83720
Boise, ID 83720

Dear Governor Little:

Thank you for your waiver request submission to the U.S. Department of Labor (Department) regarding certain statutory and regulatory provisions of the Workforce Innovation and Opportunity Act (WIOA) and the accompanying plan to improve the statewide workforce development system (enclosed). The waiver requests were received on April 21, 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 Idaho will meet the outcomes and implement the measures identified in its plan to ensure accountability agreed to by Idaho and ETA. This action is taken under the Secretary of Labor's authority to waive certain requirements of WIOA Title I, Subtitles A, B, and E, and Sections 8–10 of the Wagner-Peyser Act in WIOA Section 189(i).

Requested Waiver: Waiver of the requirements outlined in WIOA Section 107(b) to allow a state workforce development board to carry out the roles and responsibilities of a local board.

ETA Response: ETA approves, through June 30, 2028, the State's request for a waiver to allow the state board to carry out the roles of the local workforce development boards in the State. 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. Given the support for this waiver request by the local elected officials in the local area and the challenges the State and local areas have in mounting a fully compliant local-led board at this time, the U.S. Department of Labor agrees that the state board is in a better position to ensure effective service delivery in the local workforce areas in the State. Under this waiver, the Governor may designate the state board to carry out the roles and responsibilities of the local boards in the state. In implementing this waiver, the State must:

- Continue to include local input into its activities; and
- Allocate funding to the local area for which the state board is carrying out local board functions.

Requested Waiver: Waiver of WIOA Section 134(d)(2) and 20 CFR 680.910 to allow the use of supportive services for participants within 12 months of exit for employment retention.

ETA Response: ETA approves, through June 30, 2028, the State's request to waive the requirement that prohibits the use of Adult and Dislocated Worker funds for provision of supportive services during the 12 months following participant exit and entry into employment. With this waiver, the State can provide targeted supportive services to participants who have exited from the program and entered employment, including recipients of public assistance, to ease temporary barriers that may impede job retention.

Requested Waiver: Waiver of the obligation of eligible training providers (ETP) to report performance data on all students in a training program at WIOA Sections 116(d)(4)(A) and 122 and 20 CFR 677.230(a)(4) and (5) and 20 CFR 680.

ETA Response: ETA does not approve this waiver. As communicated in the previous response for this waiver request, dated July 7, 2021, and Training and Employment Guidance Letter (TEGL) No. 08-19: *Workforce Innovation and Opportunity Act (WIOA) Title I Training Provider Eligibility and State List of Eligible Training Providers (ETPs) and Programs*, ETA discontinued state use of this waiver effective June 30, 2021. ETA further communicated in TEGL No. 05-25: *Maximizing Innovation in Workforce Innovation and Opportunity Act Programs*, that "ETA will not support waiver requests that do not advance the administration's key priorities, such as waivers of performance outcomes of participants and training providers." ETA acknowledges that collecting and reporting data on all students creates additional reporting responsibilities for WIOA training providers; however, public workforce system customers deserve quality training with proven success for positive outcomes. The information WIOA requires is one of the few mechanisms available in government to identify which training provider programs truly make a difference. The State must report all student performance information in the Program Year 2025 report, which is due to ETA on October 1, 2026.

Requested Waiver: Waiver of the requirement at WIOA Section 121(e)(1) 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, through June 30, 2028, Idaho's request for a waiver of the requirement to establish and maintain a comprehensive AJC in each of the State's local areas. Under this waiver, Idaho must ensure that job seekers and employer customers in both local areas can access the programs, services, and activities provided by all required one-stop partners.

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: Jani Revier, Director, Idaho Department of Labor
Dr. Tamika Ledbetter, San Francisco Regional Administrator, ETA
Marian Esver, Federal Project Officer, ETA

Idaho 2026 State Plan Modification Waivers
Received April 21, 2026

Waiver A. - Allow for a State Board to Act as a Local Board

1. *Identify the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver*

The State of Idaho is formally seeking a waiver to permit a state board to carry out the functions of a local board. This waiver request is for a renewal of a waiver previously applied to 20 CFR 679.310(f) which states that a state board must carry out the roles of a local board when the State Plan indicates that the State will be treated as a local area under WIOA. The Workforce Innovation and Opportunity Act Sections 106(d)(2) and 107(c)(4) also direct a state board for a single state local area to carry out the functions of the local board. The Workforce Development Council has acted as both the state and local board under WIA since 2005, under WIOA since 2014, and the current structure is reflected in the Combined State Plan.

2. *Describe the actions that the State or local area has undertaken to remove State or local statutory or regulatory barriers*

No state or local policies limit the Governor's authority to require a regional plan or utilize the Workforce Development Council as the local workforce board for the state.

3. *Describes the goals of the waiver and the expected programmatic outcomes*

The primary goal to be achieved by this waiver is to reduce annual overhead and maximize the available money directed to program services, especially training and work-based learning, and services to business. The programmatic outcome is to serve a larger number of participants than would otherwise be served due to added administrative costs. To maximize resources available for service delivery, the state continues to use the Workforce Development Council as the local workforce board throughout the state. When initially implemented, this saved the WIA program in the state approximately $1.5 million dollars by removing the administrative overhead of maintaining six regions throughout the state. Since then, these former administrative funds have been utilized as WIOA program funds, allowing for more participants to be served.

As evidenced since its initial implementation, Idaho's single statewide planning structure has continued to reduce annual overhead, and maximizes the available funding directed to training and services to business and job seekers.

This statewide structure enhances efforts to transform the system into a demand driven system. The eight Idaho Department of Labor offices serve as the state's American Job Centers offering the full range of workforce development services, and dozens of mobile locations across the state expand access into rural areas to connect citizens far from the AJCs to workforce services.

This recognizes the importance of sharing data and information about new and expanding businesses to build the economy across regions.

4. *Describe how the waiver will align with the Department's policy priorities, (A)-(E)*

The Workforce Development Council structure has been in place since the Jobs Training Partnership Act. Its current membership aligns with the prescribed composition under WIOA, including a majority of business representatives, along with partners from government, labor, community-based and educational entities. State education policy is thoroughly aligned with the state's workforce development goals.

5. *Describe the individuals affected by the waiver*

This waiver allowing a single statewide regional planning structure has allowed for an average annual increase in training opportunities for more adults, dislocated workers and at–risk youth and has helped the state to maintain service levels despite funding cuts over the years.

6. *Describe the processes used to monitor, offer a local board notice, public comment opportunity, and report in the WIOA Annual Report, (A)-(E)*

As evidenced since its initial implementation, the single statewide planning structure has reduced annual overhead, maximizing the available money directed towards program services, including training/work-based learning, and services to business and job seekers. In the spirit of WIOA's intent, the State has emphasized spending program funds towards those individuals most in need, and who can benefit from intensive staff intervention, and direct training and support of businesses and participants, all of which positively impact the achievement of performance goals.

The single statewide structure has strengthened administrative oversight and accountability processes. Prior to this change, administrative deficiencies resulted in substantial disallowed costs for Idaho's largest Workforce Investment Area. The strengthened administrative structure under the waiver has assisted Idaho to minimize disallowed costs, further enabling the redirection of funds from service provider and administration to direct participant training and support.

As noted earlier in this section of Idaho's Combined State Plan, Idaho is comprised of two local areas – the Balance of State and eastern Idaho – a structure established since 2005. Under this waiver, the state Workforce Development Council serves as a statewide local board for both local areas, functioning as the planning structure outlined earlier. Prior to submission of this plan modification and previous versions, the state and the council reached out to the East Central Idaho Elected Official Consortium and its WIOA representatives, East Central Idaho Planning and Development Association, dba ALTURA, to discuss any potential changes to this structure and/or affirm the existing relationship. Since the structure's establishment, ALTURA and those it represents have unanimously supported this waiver and its objectives. The MOU between ALTURA and the Workforce Development Council outlines the roles each have in the statewide and local governance of Idaho's workforce development system.

In addition, the Workforce Development Council itself includes several elected officials as part of its membership. Two serve as local elected officials, and two others are state representatives – one representing state House and the other the state Senate. Each member represents a different area of the state and brings a local perspective to the issues affecting workforce matters across the state.

Funds to the local areas are distributed based on the state's WIOA Title I-B Formula Funds Distribution Policy, which outlines how the state allots funds to each local area.

Idaho's waiver requests, along with its WIOA Combined State Plan, were posted on the Idaho Workforce Development Council's website for comment and review by required parties and the public. An invitation was extended to two influential organizations in the state – the Idaho Association of Cities and Idaho Association of Counties - to provide them the opportunity to review all the waivers contained in the entire Combined State Plan. No local boards are affected by the waiver. All state Workforce Development Council members received copies of these waivers along with Idaho's PY2024-2027 WIOA Modified Combined State Plan. The State Workforce Development Council reviewed and approved both the waivers and WIOA Combined State Plan during its March 11, 2026 meeting. These meetings are announced and open to the public via a variety of means across the state.

The comment period for both the WIOA Combined State Plan and the waivers was open from February 9, 2026, through March 11, 2026. No comments were received during that time for this or any of the other waivers.

7. *Provide the most recent data regarding the results and outcomes from the waiver's implementation (if a waiver renewal)*

The primary goal sought by this waiver is to reduce administrative costs and maximize the available money directed to career and training services, including work-based learning, and services to businesses and job seekers. The eventual programmatic outcome results in service to a larger number of participants that would otherwise be served due to higher administrative costs. To maximize resources available for service delivery, the state continues to use the flexibility of this waiver to allow the WDC to serve as the local workforce board. When initially implemented, this strategy saved Idaho's Workforce Investment Act (WIA) program $1,482,788 by removing the required maintenance of six local areas throughout the state. These former administrative funds have been utilized as program funds, which allows more participants to be served and allows the state to maintain service levels, despite funding cuts over the years. In today's dollars, the costs easily translate to a programmatic infusion of $2,476,142 which, in 2025, amounts to just over 34.48% of the state's total WIOA Title I-B allotment from USDOL for PY24.

The single statewide planning structure helps reduce annual overhead, emphasizing spending program funds towards direct training and support of businesses and participants. By strengthening administrative oversight and accountability processes, it has helped significantly in eliminating administrative deficiencies over the years that may have resulted in disallowed costs.

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Waiver B. – Waiver of WIOA Section 134(d)(2) and 20 CFR 680.910 to Allow for Post-Exit Supportive Services for Employment Retention

1. *Identify the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver*

The State of Idaho is requesting a waiver of WIOA Section 134(d)(2) and 20 CFR 680.910, which limit the provision of supportive services for Adult and Dislocated Worker participants to the period of active participation before program exit.

Under current law and regulation, supportive services may not be provided during the 12 months following exit, even when such services are necessary to support employment retention and to ensure a successful transition toward self sufficiency.

2. *Describe the actions that the State or local area has undertaken to remove State or local statutory or regulatory barriers*

No State statutory or regulatory barriers exist at this time that would prevent the provision of supportive services to Adult and Dislocated Worker participants during the post-exit period.

3. *Describes the goals of the waiver and the expected programmatic outcomes*

The primary strategic goals supported by this waiver include improving employment retention outcomes, supporting wage progression, and reducing early job loss among Adult and Dislocated Worker participants.

These goals align with Idaho's broader workforce development strategy and performance accountability framework.

4. *Describes how the waiver will align with the Department's policy priorities, (A)-(E).*

If approved, Idaho projects measurable improvements in employment retention and earnings outcomes for Adult and Dislocated Worker participants who receive post-exit supportive services, compared to those participants who do not. By addressing short-term barriers such as transportation, childcare, or other work-related needs, that commonly arise immediately after entering unsubsidized employment, this waiver is expected to strengthen participants' ability to maintain employment and remain engaged in the labor force.

In addition, Idaho's need for this waiver is informed by significant shifts in the populations served under the Adult and Dislocated Worker programs. Since PY17, Idaho has experienced a 508 percent increase in serving individuals with a history of incarceration, a 123 percent increase in serving long-term unemployed individuals, and a 34 percent increase in serving individuals with disabilities. These populations often face greater barriers to sustained employment, particularly during the critical post-exit period. Allowing limited, targeted post-exit supportive services is intended to help mitigate these challenges and support employment retention for participants with higher support needs.

As a result of waiver implementation, Idaho expects to see improvements in Employment Rate 2nd Quarter After Exit (ER2) and Employment Rate 4th Quarter After Exit (ER4), reflecting stronger short-term and longer-term employment retention for participants receiving post-exit supportive services. Idaho also anticipates positive impacts on median earnings, as improved employment stability supports increased hours, wage progression, and sustained attachment to the workforce.

All outcomes will be tracked annually and used to assess the effectiveness of the waiver and inform future policy decisions.

5. *Describe the individuals affected by the waiver.*

The waiver is expected to primarily benefit Adult and Dislocated Worker participants who have exited the program and entered unsubsidized employment, particularly individuals who require short-term support to stabilize employment during the transition period following exit. This includes participants who are newly employed, entering employment with limited financial reserves, or adjusting to changes in income and work schedules.

The waiver will also benefit individuals receiving public assistance or transitioning off public benefits by providing targeted, short-term supportive services that help mitigate employment disruptions and support sustained attachment to the labor force. By supporting employment retention and wage progression, the waiver is expected to promote greater economic stability and self-sufficiency for participating individuals.

No adverse impacts to other participant populations are anticipated as a result of this waiver.

6. *Describe the processes used to monitor, offer a local board notice, public comment opportunity, and report in the WIOA Annual Report, (A)-(E)*

Idaho will implement the waiver through clear state-level policy guidance that defines allowable post-exit supportive service types, establishes duration and dollar limits to ensure services remain short-term and focused on employment retention, and sets documentation requirements that directly link supportive services to retention outcomes.

Monitoring will be conducted through existing state-level oversight and local monitoring processes. Monitoring will include verification of participant need, review of service allowability and reasonableness, and documentation demonstrating that supportive services are necessary to support employment retention and are not otherwise available. Oversight activities will also include reviewing post-exit supportive service provision, analyzing employment retention and wage outcomes for waiver participants, and conducting regular compliance reviews to ensure fiscal integrity. The results of these efforts will be reported in the state's WIOA Annual Report.

Idaho's waiver requests, along with its WIOA Combined State Plan, were posted on the Idaho Workforce Development Council's website for comment and review by required parties and the public. An invitation was extended to two influential organizations in the state – the Idaho Association of Cities and Idaho Association of Counties - to provide them the opportunity to review all the waivers contained in the entire Combined State Plan. No local boards are affected by the waiver. All state Workforce Development Council members received copies of these waivers along with Idaho's PY2024-2027 WIOA Modified Combined State Plan. The State Workforce Development Council reviewed and approved both the waivers and WIOA Combined State Plan during its March 11, 2026 meeting. These meetings are announced and open to the public via a variety of means across the state.

The comment period for both the WIOA Combined State Plan and the waivers was open from February 9, 2026, through March 11, 2026. No comments were received during that time for this or any of the other waivers.

7. *Provide the most recent data regarding the results and outcomes from the waiver's implementation (if a waiver renewal)*

Not applicable. This is a first time request for this waiver and has not been previously approved.

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Waiver C. – Request for Waiver of "All-Student" ETPL Performance Reporting, Program Years (PY) 2024–2027

1. *Identify the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver*

Idaho requests a waiver of the requirement to collect and report performance data for all students in each program of study listed on the State Eligible Training Provider List (ETPL), as required by:

- **WIOA Sections 116 and 122**
- **20 CFR 677.230**
- **20 CFR 680.400–680.530**

Under this waiver, Idaho would continue to collect and report all required performance data for WIOA-funded participants; the waiver would exempt providers from reporting outcomes for non-WIOA students in ETPL-listed programs.

2. *Describe the actions that the State or local area has undertaken to remove State or local statutory or regulatory barriers*

There are no Idaho statutes or local regulations that prevent implementation of this waiver. Idaho Department of Labor (IDOL) policies are aligned with current federal law and guidance.

3. *Describes the goals of the waiver and the expected programmatic outcomes*

Idaho maintains the ETPL within IdahoWorks, supporting consumer choice and workforce alignment statewide. Requiring ETPs to report performance for all students—including those not funded by WIOA—creates operational burdens that have no direct bearing on WIOA accountability and materially reduce provider participation, especially in rural areas and among public community colleges and career-technical programs.

Key Idaho dynamics:

- **Rural access:** Many counties rely on a small number of training providers; if providers withdraw from the ETPL due to reporting burden, consumer choice and geographic access shrink.
- **Funding mix:** A significant portion of Idaho trainees are supported by non-WIOA funding, including Idaho LAUNCH and other state/third-party sources. All-student reporting would compel providers to collect sensitive data (often SSNs) for students outside WIOA—raising burden and privacy concerns and disincentivizing ETPL participation.
- **Observed impact** The Executive Director of the state workforce board reports that providers regularly share feedback that ETP reporting is too cumbersome. Two of Idaho's four community college presidents conducted a cost benefit analysis and were considering pulling all their programs from the ETPL. This trend threatens consumer choice, cost competitiveness, and training capacity.

The goal of this waiver is to maintain and expand consumer choice and geographic access to high-quality training while ensuring robust, accurate reporting for WIOA-funded participants. The expected outcomes if the waiver is approved are as follows:

- **Increased ETPL participation and retention:** More providers/programs remain or join the ETPL, particularly in rural and in-demand fields.
- **Improved choice/coverage:** Greater program variety across regions, delivery modes, and price points.
- **Sustained transparency:** Continued publication of WIOA participant outcomes at the program level; optional non-WIOA metrics reported where feasible.
- **Faster onboarding:** Reduced administrative barriers for ETPs lowers cycle time to list/renew programs that meet quality and demand criteria.

Without this waiver, Idaho would be compelled to remove ETPs / programs that cannot or will not submit all-student data, undermining ETPL utility and pushing local areas to rely on ITA exceptions (20 CFR 680.320) more frequently—counter to transparency and choice objectives.

4. *Describes how the waiver will align with the Department's policy priorities, (A)-(E).*

The waiver maintains accountability where it matters—WIOA-funded participants—while advancing:

- **Customer choice and transparency** (program-level outcomes for WIOA participants remain published).
- **Employer engagement and sector alignment** (ETPL remains responsive to in-demand occupations).
- **Access** (reduces ETPL contraction in rural/frontier areas).

In addition, Idaho has strengthened ETPL transparency and alignment by:

- Publishing WIOA participant performance at the program level in *IdahoWorks* (completion, employment, median earnings, credential attainment).
- Encouraging providers to submit voluntary program metrics (e.g., licensure pass rates, third-party certifications, work-based learning placements), even when not WIOA-funded.
- Coordinating with Registered Apprenticeship sponsors (20 CFR 680.470) to keep RA options visible on the ETPL.
- Using local demand signals (job postings, sector partnerships, employer advisory input) to inform ETPL approvals and renewals.

These steps ensure that the state continues to preserve consumer choice and WIOA transparency, as mandated by USDOL, while right-sizing reporting to WIOA-relevant populations.

5. *Describe the individuals affected by the waiver.*

- **Job seekers and WIOA participants:** Broader options, better regional coverage, and more timely starts.
- **Rural communities:** Reduced risk of provider exit from ETPL improves rural participants' access to training**.**

- **Employers:** More demand-driven program offerings aligned to local hiring needs.
- **Training providers:** Lower administrative burden, improved privacy posture, and clearer accountability **for WIOA-funded** outcomes.

6. *Describe the processes used to monitor, offer a local board notice, public comment opportunity, and report in the WIOA Annual Report, (A)-(E)*

If granted, Idaho will implement the following controls:

- **Data & reporting**
    - Continue to collect and report all required WIOA participant outcomes under 20 CFR 677.230.
    - Publish WIOA program-level outcomes in *IdahoWorks* and in the state's WIOA Annual Report.
    - Encourage—but not require—submission of aggregate non-WIOA indicators (e.g., licensure pass, completion) where available.
- **Program oversight**
    - Include waiver impact checks in annual on-site/desk reviews (ETPL compliance, consumer choice, regional coverage).
    - Track ETPL participation (providers/programs) and **time-to-approval**; flag material declines by region/occupation for action.
    - Engage Local Workforce Development Areas (LWDAs) and providers via an ETPL working group to review data burden, privacy concerns, and usability.
- **Corrective action**
    - If transparency or access measurably declines (e.g., ≥10% drop in regional program availability), Idaho will propose improvements (targeted outreach, technical assistance, or policy adjustments).
    - Idaho assures that, with the approval and implementation of this waiver, the state
    - Will not waive ETPL eligibility criteria, program quality standards, or RA automatic eligibility under 20 CFR 680.470.

- Will continue to ensure that ITA-funded training is tied to in-demand occupations and that program performance for WIOA participants informs funding decisions.
- Will maintain all privacy, security, and FERPA-aligned protections for participant data.

Idaho's waiver requests, along with its WIOA Combined State Plan, were posted on the Idaho Workforce Development Council's website for comment and review by required parties and the public. An invitation was extended to two influential organizations in the state – the Idaho Association of Cities and Idaho Association of Counties - to provide them the opportunity to review all the waivers contained in the entire Combined State Plan. No local boards are affected by the waiver. All state Workforce Development Council members received copies of these waivers along with Idaho's PY2024-2027 WIOA Modified Combined State Plan. The State Workforce Development Council reviewed and approved both the waivers and WIOA Combined State Plan during its March 11, 2026 meeting. These meetings are announced and open to the public via a variety of means across the state.

The comment period for both the WIOA Combined State Plan and the waivers was open from February 9, 2026, through March 11, 2026. No comments were received during that time for this or any of the other waivers.

7. *Provide the most recent data regarding the results and outcomes from the waiver's implementation (if a waiver renewal)*

Not applicable. This is a first time request for this waiver and has not been previously approved.

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Waiver D. – To Waive the Requirement for a Comprehensive One-Stop Center in Each Local Area

1. *Identify the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver*

The state of Idaho, in agreement with the State Workforce Investment Board. (SWIB), is requesting to waive the requirement outlined in WIOA sec. 121 (e)(1) and 20 CFR 678.300 (c) and 678.605 to maintain comprehensive one-stop centers in each local area for Program Years 2026 and 2027. Idaho's two local areas, the Balance of State (BOS) and Eastern Idaho, are overseen by its SWIB, which carries out the roles and responsibilities of the local workforce development boards (LWDB) through a waiver from USDOL issued at the inception of WIOA. This waiver removed barriers, such as minimizing administrative activities costs, reducing administrative burdens, and allowing the state to redirect funding for direct participant services. Idaho has historically sought to eliminate and reduce these barriers to increase prospective participants' access to its WIOA programs across the state.

2. *Describe the actions that the State or local area has undertaken to remove State or local statutory or regulatory barriers*

No state or local statutory or regulatory policies limit the state from implementing WIOA programs in each local area without a comprehensive one-stop center.

3. *Describes the goals of the waiver and the expected programmatic outcomes*

The primary goal of this waiver is to reduce the administrative burden necessary for the establishment of not just one, but two comprehensive one-stop centers. This reduction would help to eliminate any specific overhead costs associated with this designation, freeing these funds for direct services to individual and business customers. The programmatic outcome is to allow staff the ability to focus on direct or indirect service provision, rather than spend time engrossed in addressing administrative constraints that do not realistically enhance or improve services to WIOA participants with the available funding. To maximize resources available for direct service delivery, the state will continue to use:

- the SWIB as the local workforce board; and
- the current Youth, Adult, and Dislocated Worker service delivery structure

4. *Describe how the waiver will align with the Department's policy priorities*

The requirement to establish a comprehensive one-stop center in each local area has significantly impacted the state's progress to advance WIOA programs across Idaho by adding an estimated $19,607 in administrative costs, which could otherwise be used to serve 6 Idahoans in WIOA programs. All of Idaho's affiliated AJCs provide the same level of service as outlined under 678.305, which defines a comprehensive one-stop center. Each AJC already provides direct access or closely coordinated indirect service access to all workforce partner programs, as identified in the state's most recent One-Stop certification review.

The preamble of WIOA's Final Rules notes the following:

…many local areas will require the establishment of multiple centers to serve their populations properly. This is highly dependent on individualized factors in each local area. This determination is best carried out at the State and local planning level. WIOA sec. 121(a) requires the establishment of the one-stop

delivery system, consistent with the approved Unified or Combined State Plan, through the Local WDB for a local area and with the agreement of CEO for the local area. It is these entities that should determine the proper number and location of one-stop centers, by drawing on their knowledge of the area's needs.

Idaho followed this guidance as it implemented WIOA across the state. The Governor-appointed SWIB, in its role as LWDB, recognized that each local area necessitated more than one AJC to adequately serve its residents, with each site providing the full complement of required services under WIOA.

In 2019, the Idaho Department of Labor transitioned its traditional brick-and-mortar service delivery system in favor of a "multiple hub-and-spoke" delivery model. This model has one or more offices serving as regional hubs and a network of "mobile offices" spread throughout more rural localities, typically sharing space with various local entities, such as libraries or chambers of commerce. These mobile offices provide similar services like assisting job seekers and employers with labor needs and connecting those eligible with other department programs like WIOA Title I-B programs. An evaluation of this plan implementation showed that overall enrollment in the adult program within each region did not see a significant shift between residents still served by a brick-and-mortar IDOL office and those in counties without such a physical presence. This meant that mobile offices sustained the adult WIOA enrollment levels achieved by the brick-and-mortar sites, albeit at a much lower cost.

5. *Describe the individuals affected by the waiver*

The initial change to a single statewide planning area structure, in conjunction with this waiver, will provide Idaho with a structure that ensures more job seekers are served throughout the state. As evidenced since its initial implementation, the single statewide planning structure has reduced annual overhead and maximized available funding for training and direct customer services. This statewide structure enhances efforts to transform the system into a demand driven system and directly supports the importance of local community partnerships. The combination of 29 AJCs and mobile locations represent the state's comprehensive One-Stop delivery system and offers the full range of workforce development services across Idaho.

Rather than continuing to operate multiple one-stop centers designated as "comprehensive", which provide the same level of services as the other brick-and-mortar ("affiliate") and mobile offices, the state's WIOA program would, at a minimum, use cost savings to serve the same number of participants or more, improving the system's reach to Idaho residents in need of the services of its services.

6. *Describe the processes used to monitor, offer a local board notice, public comment opportunity, and report in the WIOA Annual Report*

As noted earlier, the primary goal of this waiver is to reduce administrative costs and maximize available funding directed to participant services through the removal or elimination of the administrative burdens imposed under this provision. With its approval, the local area's modified administrative structure under the waiver will strengthen the services provided under all Title I-B programs in the state, as this action will help to maximize all available monies and direct the funds towards program services.

Both the state's Administrative Entity and the program service providers will track how these changes will impact program services, monitoring expenditures as the currently do in order to see the coming decline in administrative costs that each local area will potentially experience. With the additional program services, any corresponding increase in services will also be noted.

Idaho's waiver requests, along with its WIOA Combined State Plan, were posted on the Idaho Workforce Development Council's website for comment and review by required parties and the public. An invitation was extended to two influential organizations in the state – the Idaho Association of Cities and Idaho Association of Counties - to provide them the opportunity to review all the waivers contained in the entire Combined State Plan. No local boards are affected by the waiver. All state Workforce Development Council members received copies of these waivers along with Idaho's PY2024-2027 WIOA Modified Combined State Plan. The State Workforce Development Council reviewed and approved both the waivers and WIOA Combined State Plan during its March 11, 2026 meeting. These meetings are announced and open to the public via a variety of means across the state.

The comment period for both the WIOA Combined State Plan and the waivers was open from February 9, 2026, through March 11, 2026. No comments were received during that time for this or any of the other waivers.

7. *Provide the most recent data regarding the results and outcomes from the waiver's implementation (if a waiver renewal)*

As a new waiver request, this is not applicable.

Waiver B. – Waiver of WIOA Section 134(d)(2) and 20 CFR 680.910 to Allow for Post-Exit Supportive Services for Employment Retention

1. *Identify the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver*

   The State of Idaho is requesting a waiver of WIOA Section 134(d)(2) and 20 CFR 680.910, which limit the provision of supportive services for Adult and Dislocated Worker participants to the period of active participation before program exit.

   Under current law and regulation, supportive services may not be provided during the 12 months following exit, even when such services are necessary to support employment retention and to ensure a successful transition toward self sufficiency.

2. *Describe the actions that the State or local area has undertaken to remove State or local statutory or regulatory barriers*

   No State statutory or regulatory barriers exist at this time that would prevent the provision of supportive services to Adult and Dislocated Worker participants during the post-exit period.

3. *Describes the goals of the waiver and the expected programmatic outcomes*

   The primary strategic goals supported by this waiver include improving employment retention outcomes, supporting wage progression, and reducing early job loss among Adult and Dislocated Worker participants.

   These goals align with Idaho's broader workforce development strategy and performance accountability framework.

4. *Describes how the waiver will align with the Department's policy priorities, (A)-(E).*

   If approved, Idaho projects measurable improvements in employment retention and earnings outcomes for Adult and Dislocated Worker participants who receive post-exit supportive services, compared to those participants who do not. By addressing short-term barriers such as transportation, childcare, or other work-related needs, that commonly arise immediately after entering unsubsidized employment, this waiver is expected to strengthen participants' ability to maintain employment and remain engaged in the labor force.

   In addition, Idaho's need for this waiver is informed by significant shifts in the populations served under the Adult and Dislocated Worker programs. Since PY17, Idaho has experienced a 508 percent increase in serving individuals with a history of incarceration, a 123 percent increase in serving long-term unemployed individuals, and a 34 percent increase in serving individuals with disabilities. These populations often face greater barriers to sustained employment, particularly during the critical post-exit period. Allowing limited, targeted post-exit supportive services is intended to help mitigate these challenges and support employment retention for participants with higher support needs.

As a result of waiver implementation, Idaho expects to see improvements in Employment Rate 2nd Quarter After Exit (ER2) and Employment Rate 4th Quarter After Exit (ER4), reflecting stronger short-term and longer-term employment retention for participants receiving post-exit supportive services. Idaho's newly negotiated rate for Adults' ER2 and ER4 performance is 69 percent for PY26, and 69.5 and 70 percent, respectively, for PY27. The positive outcomes resulting from the waiver's impact would undoubtedly show in the increased performance levels of these measures. **The state believes the waiver would improve outcomes two and a half to three points above current negotiated levels, noting a minimum of 72 percent**. **The state currently projects that the waiver will provide approximately 110 individuals post-exit supportive service assistance**. These changes should also impact the state's Dislocated Worker program in a similar fashion. Idaho also anticipates positive impacts on median earnings, as improved employment stability supports increased hours, wage progression, and sustained attachment to the workforce.

All outcomes will be tracked annually and used to assess the effectiveness of the waiver and inform future policy decisions.

5. *Describe the individuals affected by the waiver.*

The waiver is expected to primarily benefit Adult and Dislocated Worker participants who have exited the program and entered unsubsidized employment, particularly individuals who require short-term support to stabilize employment during the transition period following exit. This includes participants who are newly employed, entering employment with limited financial reserves, or adjusting to changes in income and work schedules.

The waiver will also benefit individuals receiving public assistance or transitioning off public benefits by providing targeted, short-term supportive services that help mitigate employment disruptions and support sustained attachment to the labor force. By supporting employment retention and wage progression, the waiver is expected to promote greater economic stability and self-sufficiency for participating individuals.

No adverse impacts to other participant populations are anticipated as a result of this waiver.

6. *Describe the processes used to monitor, offer a local board notice, public comment opportunity, and report in the WIOA Annual Report, (A)-(E)*

Idaho will implement the waiver through clear state-level policy guidance that defines allowable post-exit supportive service types, establishes duration and dollar limits to ensure services remain short-term and focused on employment retention, and sets documentation requirements that directly link supportive services to retention outcomes.

Monitoring will be conducted through existing state-level oversight and local monitoring processes. Monitoring will include verification of participant need, review of service allowability and reasonableness, and documentation demonstrating that supportive services are necessary to support employment retention and are not otherwise available. Oversight activities will also include reviewing post-exit supportive service provision, analyzing employment retention and wage outcomes for waiver participants, and conducting regular compliance reviews to ensure fiscal integrity. The results of these efforts will be reported in the state's WIOA Annual Report.

Idaho's waiver requests, along with its WIOA Combined State Plan, were posted on the Idaho Workforce Development Council's website for comment and review by required parties and the public. An invitation was extended to two influential organizations in the state – the Idaho Association of Cities and Idaho Association of Counties - to provide them the opportunity to review all the waivers contained in the entire Combined State Plan. No local boards are affected by the waiver. All state Workforce Development Council members received copies of these waivers along with Idaho's PY2024-2027 WIOA Modified Combined State Plan. The State Workforce Development Council reviewed and approved both the waivers and WIOA Combined State Plan during its March 11, 2026 meeting. These meetings are announced and open to the public via a variety of means across the state.

The comment period for both the WIOA Combined State Plan and the waivers was open from February 9, 2026, through March 11, 2026. No comments were received during that time for this or any of the other waivers.

7. *Provide the most recent data regarding the results and outcomes from the waiver's implementation (if a waiver renewal)*

   Not applicable. This is a first time request for this waiver and has not been previously approved.