

U.S. Department of Labor

Employment and Training Administration
200 Constitution Avenue, N.W.
Washington, D.C. 20210



December 2, 2025

The Honorable Janet Mills
Governor of Maine
1 State House Station
Augusta, ME 04333

Dear Governor Mills:

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 request was received on August 11, 2025. This letter provides the Employment and Training Administration's (ETA) official response to your request and memorializes that Maine will meet the outcomes and implement the measures identified in its plan to ensure accountability agreed to by Maine 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 local areas expend 75 percent of local formula youth funds on out-of-school youth (OSY).

ETA Response: ETA approves for Program Years (PY) 2024 and 2025, 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.

The State must report its waiver outcomes and implementation of the approved waiver in the WIOA Annual Report. ETA will use this information to assess continued waiver approval and to identify promising practices that may be adopted more widely. ETA is available to provide technical assistance to you in support of your goals.

If you have questions, feel free to contact my office at (202) 693-2772.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lori Frazier Bearden".

Lori Frazier Bearden
Acting Assistant Secretary

Enclosure

cc: Laura A. Fortman, Commissioner, Maine Department of Labor
 Ginny Carroll, Director, Division of Policy and Evaluation
 Danielle Worthen-Ramos, Acting Boston Regional Administrator, ETA
 Michael J Paglia, Federal Project Officer, ETA

Maine Waiver Request

Waiver of State and Local Youth Spending Flexibility for Program Years 2024 & 2025

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

The State of Maine requests a waiver of Section 129(a)(4)(A) and 20 CFR 681.410 which require state and local areas to spend not less than 75 percent of youth funds to provide career and training services to out-of-school youth. Maine requests that the waiver be approved for two consecutive program years PY2024 and PY2025 to allow local areas to expend 50% on in-school-youth and 50% on out-of-school youth. This request is being made under the Secretary's authority at WIOA Section 189(i)(3)(B) to waive certain requirements of WIOA Title I.

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

The State works closely with the local areas to identify and address barriers to serving youth and to implement steps to ensure eligible youth have access to WIOA services, such as outreach campaigns directed at disconnected youth. WIOA staff recruit youth at high schools, youth centers, and other agencies that serve youth and their families. The previous waiver was instrumental in expanding partnerships with Maine high schools and community organizations serving marginalized youth to actively connect eligible high school students to paid work experience and pre- and registered apprenticeship programs.

Waiver approval for PY24 and PY25 will be critical to their ability to continue to support the goals outlined below and give service providers a greater level of comfort and continuity in budgeting in-school youth service implementation plans. A two year approval will also provide additional time to realize positive outcomes of high school youth being served.

3. Description of State Strategic Goals:

Because Maine has an aging workforce and very low population growth, Maine's key strategic goal is to increase labor force participation. The state is working with employers to connect them to untapped labor pools; this waiver will support engagement of working age youth, both in and out of school.

A key goal of the Maine Children's Cabinet is for all Maine youth to enter adulthood healthy and connected to the workforce and/or education. To support this goal, the Cabinet launched the "Maine Career Exploration Project" in 2023, a collaboration between high schools, WIOA youth providers, vocational rehabilitation, and Jobs for Maine's Graduates focused on engaging high school youth in career exploration and experiential learning opportunities. The project helped Maine high schools to implement Extended Learning Opportunities (ELOs). ELOs involve students in career exploration activities, work experience and internships, company tours and job shadowing activities that upon successful completion result in high school credit toward graduation. Several high risk students participating in the project remained engaged in high school through to graduation. Approval of this waiver will support continued collaboration with Maine high schools for this purpose.

Another critical goal is to ensure the young labor force has access to work-based learning opportunities like registered apprenticeship. The Maine Apprenticeship Program launched numerous certified pre-apprenticeship programs in partnership with Maine high schools, the Associated General Contractors of

Maine, the AFL-CIO and other sponsors of registered apprenticeship. Last year 70 WIOA in-school-youth participated in a pre-apprenticeship program that prepared them to enter registered apprenticeship or employment in the construction and building trades. This summer 25 Maine high schools will offer another round of pre-apprenticeships in partnership with apprenticeship sponsors.

Maine Priorities That Will Be Supported by This Waiver:

- a. Increase Maine's labor force by engaging youth in career exploration and paid work experience
- b. Increase entry into employment, registered apprenticeship, or post-secondary education
- c. Increase the overall number of WIOA youth served per program year
- d. Increase Maine High Schools' awareness of WIOA services available to eligible students
- e. Decrease the number of disconnected youths by connecting youth with paid work experience, pre-apprenticeship, and extended learning opportunities before they drop out or leave school.
- f. Increase involvement of Maine employers, apprenticeship sponsors, schools, and workforce system partners in activities that ensure high school youth successfully transition to employment and/or advanced training.

4. How This Waiver Complements USDOL Priorities

Approval of this waiver will help meet the following USDOL priorities: increased labor force participation and enhanced worker productivity, increase in the number of paid work experience opportunities for in-school youth, increased access to pre- and registered apprenticeship opportunities for young workers, and an improved response to employer workforce needs.

5. Quantifiable Projected Program Outcomes Resulting from implementation of this waiver:

Projected quantifiable outcomes of this waiver include:

- An overall increase in labor force participation of working age youth
- A 30% increase in the number of in-school youth participating in a pre-apprenticeship program
- A 40% increase in the number of in-school youth entering unsubsidized employment.
- A 35% increase in the number of WIOA youth served overall
- A significant increase in the number of Maine employers, including registered apprenticeship sponsors, providing work-based learning activities to WIOA youth.

Outcomes of the PY23 waiver:

The previous waiver promoted an increase in the overall number served, from **367** in PY22 to **533** far in PY24. Last year over **177** in-school youth participated in paid work experiences and **70** completed a pre-apprenticeship program.

Outcomes of high school age youth enrolled under this waiver exceeded most negotiated levels:

PY	AGE	EQ2	EQ2	EQ4	EQ4	EQ2\$	EQ2\$	CRED	CRED	MSG	MSG
		Neg.	Act.	Neg.	Act.	Neg.	Act.	Neg.	Act.	Neg.	Act.
PY22	14-18	67.6%	69.6%	70.5%	72.5%	\$4,000	\$3,840	56.5%	51.0%	50.0%	56.0%
PY23	14-18	68.0%	64.1%	71.0%	75.8%	\$4,050	\$5,314	57.4%	57.8%	51.0%	58.2%

KEY: Act. = actual rate, CRED = credential attainment, EQ2 = employed second quarter after exit, EQ4 = employed fourth quarter after exit, EQ2\$ = median earnings second quarter after exit, MSG = measurable skill gains, Neg. = State negotiated rate.

6. Individuals, groups, or populations benefiting, or otherwise impacted by the waiver.

The Annie E. Casey Foundation's Kids Count Data Book shows 5% of youth aged 16-19 in Maine are not in school or working, with percentages as high as 14% in rural counties, putting them at risk of experiencing negative outcomes. This waiver will help high school youth realize their aspirations by ensuring they are connected to resources and opportunities before they leave school. The waiver will allow us to continue to serve youth with barriers to employment, including youth from low income families, youth with disabilities (*70% of WIOA youth served in PY24 identified as an individual with a disability*), homeless youth, youth with skill deficiencies, justice involved youth, single parents, and former foster youth.

Employers offering pre-and registered apprenticeships, on-the-job training, paid work experience, internships, and job shadows will benefit from expanded access to young workers who may not otherwise connect to the employment opportunities they offer.

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

Youth program statistics are reviewed on a quarterly basis, to ensure planned enrollment numbers and negotiated performance measures are being met or are on track to being met. Similarly, quarterly financial reports are reviewed to ensure spending thresholds are met and spending caps are not exceeded. Local areas provide quarterly narrative reports that discuss how they are meeting enrollment and performance goals. The reports also discuss best practices, new partnerships and approaches, and identify issues that may require technical assistance. Maine DOL meets monthly with WIOA board staff and service provider staff to discuss progress, best practices and challenges and offer technical assistance as necessary.

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

A press release inviting public comments was published on July 23, 2025, providing a seven-day comment period; in addition, required partners, local boards, and service provider agencies were informed directly. Three comments were received, one pointing out a need for corrected information regarding the number of disengaged youths in Maine which has been corrected and two in strong support of approval of this waiver. A copy of the press release for public comment and all three public comments received are attached to this request.