U.S. Department of Labor

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

May 29, 2026

The Honorable Joe Lombardo
Governor of Nevada
State Capitol Building
101 N. Carson Street
Carson City, NV 89701

Dear Governor Lombardo:

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 2, 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 requests and memorializes that Nevada will meet the outcomes and implement the measures identified in its plan to ensure accountability agreed to by Nevada 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 20 CFR 681.550 to allow WIOA individual training accounts (ITAs) for in-school youth (ISY).

ETA Response: ETA approves, for Program Years (PY) 2026 and 2027, the State's request to waive the requirement limiting ITAs to only out-of-school youth (OSY), ages 16–24. In addition to these OSY, the State may use ITAs for ISY, ages 16–21. ETA reviewed the State's waiver request and plan and has determined that the requirements requested to be waived impede the ability of the State to implement its plan to improve the workforce development system.

Requested Waiver: The State is requesting a waiver of WIOA Section 134(c)(3)(H)(i) and 20 CFR 680.720(b) in order to increase on-the-job training (OJT) employer reimbursement up to 90 percent for businesses with 50 or fewer employees.

ETA Response: ETA approves the State's waiver request through June 30, 2028, for the WIOA Title I Adult, Dislocated Worker, and Youth formula funds. 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. Existing statutory authority permits the State and its local workforce areas to increase the reimbursement rate for OJT contracts up to 75 percent. The State may also reimburse up to 90 percent for OJT for businesses with 50 or fewer employees. ETA expects the utilization of OJT to increase in the State as a result of this waiver.

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 OSY.

ETA Response: ETA approves, for PYs 2026 and PY 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 Nevada 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 PY 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 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 requirements of WIOA Sections 133(a)(2) and 134(a)(2)(A) to allow flexibility to use up to 50 percent of funds reserved by the Governor to provide statewide rapid response activities under WIOA Section 134(a)(2)(A) to also provide statewide employment and training activities in the first year of funding availability.

ETA Response: ETA approves, for PYs 2026 and 2027, the State's request to waive the spending requirements of WIOA Sections 133(a)(2) and Section 134(a)(2)(A) to enable the State to use up to 50 percent of funds reserved by the Governor to provide statewide rapid response activities under WIOA Section 134(a)(2)(A) to also provide statewide employment and training activities in the first year of funding availability. ETA reviewed the State's waiver request and plan and has determined that the requirements requested to be waived impede the ability of State to implement its plan to improve the workforce development system.

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, for PYs 2026 and 2027, 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 for WIOA Section 134(c)(3)(F)(i) and (G) and 20 CFR 680.320(a) and 680.340(a) to allow for all training services to be provided through training contracts.

ETA Response: ETA approves, for PYs 2026 and 2027, the State's request to allow contract for services to be used instead of ITAs. 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. ETA acknowledges the State's intention to maintain ITAs as a training option, but to deploy training contracts as the primary mechanism for delivering training services where contracted models better ensure alignment with employer demand and direct employment outcomes.

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

ETA Response: ETA approves, for PYs 2026 and 2027, the State's request to waive the requirement that local 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.

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: Scott Hammond, Executive Director, Governor's Office of Workforce Innovation
Dr. Tamika Ledbetter, ETA Regional Administrator
Karen Ware, ETA Federal Project Officer

Nevada 2026 State Plan Waivers

Waiver #1: Individual Training Accounts (ITA) – WIOA sec. 134; 20 CFR §681.550

Pursuant to the Workforce Innovation and Opportunity Act (WIOA) Title I and Wagner-Peyser Act waiver requirements and request process (WIOA sec. 189(i)(3)(B); 20 CFR §679.620; TEGL 8-18), the Nevada Department of Employment Training and Rehabilitation (DETR), designated state workforce agency for the State of Nevada, requested to waive the requirement limiting individual training accounts (ITAs) to only out-of-school youth (OSY) ages 16-24 pursuant to 20 CFR §681.550, and to allow the use of said training funds for ITAs for in-school youth (ISY) per WIOA sec. 134.

This is a statewide requested waiver to grant ISY the same participant opportunities available to OSY by empowering local workforce area staff to use ITAs, when appropriate. It promotes the use of training funds for ISY, facilitating their access to provide education and training to ISY and promote training as another option to entry into an increasingly competitive labor market. The waiver grants local workforce boards the flexibility to select training providers from Nevada's list for ISY with choices and access to training aligned with high-growth industries and occupations. This waiver eliminates the requirement for local workforce board one-stop operators to register ISY participants aged 18 years or older in the WIOA Adult program. This alleviates disruption in training transitions as ISY participants can seamlessly progress from the WIOA Youth program to the WIOA Adult program without the need for re-enrollment. The state requested this waiver for the WIOA Title I 2020 program year (July 1, 2020-June 30, 2021) and subsequently received extensions through June 30, 2025.

State strategic goals/US DOL's priorities supported by waiver request: The WIOA Final Rule, USDOL indicated that ISY age 18 or older may access ITAs through a WIOA adult program. This creates a gap issue for younger ISY (e.g., 16-18) having the ability to access ITA-funded education and training programs who are at risk of dropping out of school. Youth caught in this gap are then vulnerable to dropping out of school, leaving the workforce program, and not achieving the education, training and certifications needed to demonstrate requisite skills to employers.

The waiver is designed to increase program flexibility and increase choice and access to opportunities based on youth customers' assessed needs in terms of training that leads to employment in high growth industry sectors and occupations. The waiver removes barriers to training opportunities through not requiring local workforce board one-stop operators to register ISY participants who are 18 years or older in the WIOA Adult program, thus mitigating the disruption in training between WIOA Youth program enrollment to WIOA Adult program enrollment.

Projected programmatic outcomes from waiver: The waiver improves outcomes and provides other tangible benefits for jobseekers and employers as follows:

1. Increase the number of youth that utilize ITAs to gain an industry-recognized credential and/or another postsecondary credential. Current Performance: In PY24, 23 ISY youth (9 % of active ISY) received occupational skills training. Nevada anticipates utilizing this waiver on 10% of active ISY, equivalent to 25-50 times per program year.
2. Increase in performance accountability measures for youth as found in WIOA sec. 116(b)(2)(A)(ii), thus increasing credential attainment and measurable skills gains. Current Performance: Based on PY24 and current year performance indicators for all youth the following outcomes would be expected:

- Increase of quarterly earnings of 29-30% for youth who receive occupational skills training vs. no occupational skills training.
- Increase in 2Q employment of 7% for youth who receive occupational skills training vs. no occupational skills training.
- Increase in 4Q employment of 10% for youth who receive occupational skills training vs. no occupational skills training.
- Increase in credential rates of 14% for youth who receive occupational skills training vs. no occupational skills training.
- Increase in measurable skills gain of 31% for youth who receive occupational skills training vs. no occupational skills training.

Given the small relative sample size of 20-25 ISY youth being served under this waiver annually, Nevada expects:

- Increase of quarterly earnings of 32-33% for youth who receive occupational skills training vs. no occupational skills training.
- Increase in 2Q employment of 11% for youth who receive occupational skills training vs. no occupational skills training.
- Increase in 4Q employment of 5% for youth who receive occupational skills training vs. no occupational skills training.

- Increase in credential rates of 7% for youth who receive occupational skills training vs. no occupational skills training.
- Increase in measurable skills gain of 15% for youth who receive occupational skills training vs. no occupational skills training.

3. Promotion of innovative strategies to address student dropouts through dual-enrollment, occupational training, and work-based learning opportunities such as pre-apprenticeships and internships.
4. Reduction in WIOA Youth program dropouts by allowing ISY to remain enrolled, mitigating the program re-enrollment gap.

Long-term benefit to ISY participants: DETR intends that this waiver will result in long-term benefits and gains to ISY by expanding training opportunities that will allow them to increase their career and work readiness, enhance their connections to training programs that align their occupational interests to prepare them for work-based learning and employment. Furthermore, by allowing ISY access to ITAs it enhances the continuity of services for all youth in Nevada by creating gainful and sustainable career pathways, as well as creating a sustainable trained workforce for Nevada employers for the long recovery period.

Procedure for monitoring progress of waiver implementation/collection of outcome information: DETR continues monitoring state and local area performance to assess the effectiveness of this waiver using both state and federal accountability systems to ensure that all negotiated performance measures are met including expenditure percentages, results are accurately reported and will provide necessary technical assistance to the Local Boards, one-stop operators and service providers. DETR's monitoring policy is outlined inState Compliance Policy 5.7.

Assurance of state posting of the request for public comment and notification of affected LWDBs: DETR provided public review and comment of this waiver on January 9, 2026, through February 9, 2026. The proposed waiver in compliance with Nevada statutory requirements was reviewed and responses were developed for all comments received. DETR notified all Boards of the waiver submission and sought their input before submitting this request to USDOL ETA.

- Waiver #1 Approved: November 13, 2020 (PY2019)
    - This waiver is approved through June 30, 2021.

- Waiver #1 Extension Approved: June 29, 2021 (PY2020)
    - This waiver is approved through June 30, 2022.
- Waiver #1 Extension Approved: June 7, 2022 (PY2022 & 2023)
    - This waiver is approved through June 30, 2024
- Waiver #1 Extension Approved: May 30, 2024 (PY2023)
    - This waiver is approved through June 30, 2025

Waiver #2: On-The-Job Training (OJT) – WIOA sec. 134(c)(3)(H)(i); 20 CFR §680.720(b)

Pursuant to the Workforce Innovation and Opportunity Act (WIOA) Title I and Wagner-Peyser Act waiver requirements and request process (WIOA sec. 189(i)(3)(B); 20 CFR §679.620; TEGL 8-18), DETR, designated state workforce agency for the State of Nevada, requested a waiver of the requirements of the Workforce Innovation and Opportunity Act (WIOA) Section 134(c)(3)(H)(i) and 20 CFR §680.720(b) in order to increase on-the-job training (OJT) employer reimbursement up to 90 percent for businesses with less than 50 employees. Pursuant to 20 CFR §680.720, employers may be reimbursed up to 50 percent of the wage rate of an OJT participant, and up to 75 percent using the criteria in 20 CFR §680.730, for the extraordinary costs of providing the training and additional supervision related to the OJT.

The approved waiver allowed for a sliding scale of OJT training employer reimbursements that range from 50-90 percent, depending on the number of employees. DETR received an extension request for this waiver to extend through June 30, 2026, to allow for a sliding scale for the OJT training employer reimbursements that range from 50-90percent, dependent on the number of employees. The state is requesting an extension through June 30, 2028.

State strategic goals/USDOL priorities supported by waiver request: The waiver is in alignment with national policy aimed at cultivating a workforce system that is responsive to the diverse needs of both individuals and employers. In Nevada, we anticipate achieving the following objectives upon approval of this waiver request, while ensuring a commitment to prioritizing diversity in Nevada:

1. **Enhance Flexibility for Local Economic Impact ** We will promote on-the-job training (OJT) as a vehicle to engage employers, with a particular emphasis on those in targeted sectors. Our approach will prioritize by ensuring that underrepresented individuals and communities have equitable access to these opportunities. This will not only maximize flexibility in resource allocation but also address systemic disparities.
2. **Transition to an Inclusive, Demand-Driven, Sector-Based System :** Our goal is to transform our current workforce system into a demand-driven, sector-based, and regionally oriented model that is inherently inclusive. We will work to ensure that marginalized and underserved populations are fully integrated into this model, thus contributing to more equitable talent development and economic growth.
3. **Expand Training and Employment Opportunities :** In our efforts to increase training and transitional employment opportunities, we will place a strong emphasis on reaching out to unemployed individuals and hard-to-serve youth and adults from diverse backgrounds. This commitment will empower these communities with the skills and opportunities they need to access high-skill, high-wage, high-demand occupations and industries.
4. **Boost Business Engagement with an Inclusive Lens:** Encouraging businesses to engage more with the local workforce system will include strategies that promote an inclusive workplace. This includes incentivizing employers to create diverse and inclusive work environments, making hiring and training opportunities accessible to all individuals, regardless of their background.
5. **Ensuring Accessibility and Inclusion in Implementation:** Throughout the implementation of this waiver, we will proactively address barriers and biases that may hinder diverse populations from benefiting fully. This will include measures to ensure accessibility for individuals with disabilities and outreach efforts that take into account cultural sensitivities and languages spoken in our diverse communities.

By weaving these principles into our workforce strategies, we aim not only to enhance the economic vitality of our state but also to promote social equity and inclusivity, making sure that the benefits of workforce development are accessible to all, regardless of their background or circumstances.

Projected programmatic outcomes from waiver: The projected programmatic outcomes of this waiver for employers with 50 or fewer employees up to a 90% On-The-Job (OJT) employer reimbursement are as follows:

1. Enhanced Local Economic Vitality: The flexibility provided by the waiver will allow for more effective allocation of

resources to areas with the highest demand for workforce services. This in turn will lead to increased economic vitality in local communities, particularly in targeted industry sectors. By aligning workforce development with the needs of these sectors, we anticipate stronger, more resilient local economies.

2. Capacity Building for Workforce and Industries: By promoting on-the-job training (OJT) as a means to engage employers, we anticipate the growth of a skilled and adaptable workforce. This approach will also enhance the long-term viability of industries by ensuring they have access to a well-trained talent pool. As a result, industries will be better equipped to compete on a regional and national level.
3. Transformation into a Demand-Driven System: The waiver supports the transformation of the workforce system into one that is demand-driven, sector based, and regionally oriented. This shift will create a dynamic talent development pipeline that aligns with the evolving needs of industries. This, in turn, will lead to a more responsive and adaptable workforce.
4. Increased Opportunities for Unemployed Workers: The emphasis on training and transitional employment opportunities will benefit unemployed individuals, including those who are hard to serve. They will gain access to relevant job training and portable skills that prepare them for high-skill, high-wage, high-demand occupations and industries. This is expected to reduce unemployment rates and improve overall workforce participation.
5. Business Engagement and Growth: By providing additional incentives for businesses to hire and train new workers, we anticipate increased engagement with the local workforce system. Small and medium-sized businesses are expected to benefit significantly. This will lead to the growth of the local businesses and an expansion of employment opportunities.
6. Workforce Development Accessibility: The programmatic outcomes will prioritize ensuring that workforce development opportunities are broadly accessible across the community. These efforts will strengthen inclusivity and equity in the workforce, with a particular emphasis on addressing the needs of marginalized and underserved populations
7. Addressing Prior Barriers: The implementation of a sliding scale for reimbursement will address previous barriers to the use of OJT, making it a more attractive option for businesses. This will facilitate more widespread adoption of OJT as a workforce development strategy.
8. Strategic Alignment with National Policy: The outcomes of this waiver will align with the national workforce development policy objectives, fostering collaboration and coherence between state and federal initiatives.

Overall, the projected programmatic outcomes of this waiver are designed to enhance workforce development, promote economic growth, and ensure that the benefits of these efforts are accessible and inclusive for all residents of Nevada.

Current Performance: During the period July 2020 through June 2023, Nevada has utilized the 90% waiver 226 times and obligated $1,388,377 with a successful completion rate of 70.8%. The average wage for these OJTs is $18.38. The top 5 occupations were: Receptionists and Information Clerks, Heating, Air Conditioning, and Refrigeration Mechanics and Installers: Billing and Posting Clerks; Dental Assistants; Bookkeeping, Accounting, and Auditing Clerks. In addition, the local areas have used the 75% rule to provide an additional 38 OJTs and obligated $230,944 with a successful completion rate of 82.1 %. Average wage for these OJTs has been $19.16. Utilization of the 90% OJT waiver was 100 or 68% with over 78% completing an OJT successfully. The participants who benefited from the OJTs had an average wage of $17.01 per hour as compared to a wage of $20.08 for all OJT participants. 39% of the participants served identify as African American/Black; American Indian; Asian; Hawaiian/Other Pacific Islander; or more than one race with 46% identifying as Hispanic or Latino. The participants had the following barriers: 5.6% re-entry; 1.4% veteran; and 13.9% persons with a disability. Statewide performance was not measurably impacted by the waiver. The outcomes increased further in PY2024, utilization of the 90% OJT waiver was 100 or 68% with over 78% completing an OJT successfully. The participants who benefited from the OJTs had an average wage of $17.01 per hour as compared to a wage of $20.08 for all OJT participants. 39% of the participants served identify as African American/Black; American Indian; Asian; Hawaiian/Other Pacific Islander; or more than one race with 46% identifying as Hispanic or Latino. The participants had the following barriers: 5.6% re-entry; 1.4% veteran; and 13.9% persons with a disability. Statewide performance was not measurably impacted by the waiver. Nevada projects the following outcomes associated with the 90% waiver:

- Annual utilization: 100 individuals
- Successful completion rate: 80% - Nevada expects slightly lower success rates with the increased number of OJTs.
- Average wage: $17.00 Nevada expects a sight moderation in wage with the increase in the number of 90% OJTs and as labor markets continue loosening.

Nevada expects small businesses, which most often use the 90% OJT waiver, to be a critical part of the continued recovery from recent economic challenges.

The waiver will positively impact a wide range of individuals, groups, and communities. Employers—particularly small and medium-sized businesses—will benefit from greater flexibility and incentives to engage in on-the-job training and invest in workforce development, enabling them to hire and train workers more effectively. Unemployed workers will gain increased access to training and transitional employment opportunities that build portable skills and improve their ability to secure high-skill, high-wage, in-demand jobs. Hard-to-serve youth and adults, including individuals with limited work experience or barriers to employment, will have expanded access to training and employment pathways that support long-term stability. Local communities will benefit from a stronger, more resilient workforce that contributes to economic growth and vitality. Industry sectors targeted by the waiver will gain access to a more skilled and adaptable talent pipeline, helping them remain competitive and responsive to evolving labor market needs. Additionally, the waiver's emphasis on diversity, equity, inclusion, and accessibility will enhance equitable access to workforce development opportunities, ensuring that marginalized and underserved populations benefit more fully from available resources.

Long-term benefit to OJT participants: This waiver results in long-term benefits and gains to jobseekers by creating gainful and sustainable career pathways, as well as creating a skilled and versatile workforce for Nevada.

Procedure for monitoring progress of waiver implementation/collection of outcome information: DETR continues monitoring state and local area performance to assess the effectiveness of this waiver using both state and federal accountability systems to ensure that all negotiated performance measures are met including expenditure percentages, results are accurately reported and will provide necessary technical assistance to the Local Boards, one- stop operators and service providers. DETR's monitoring policy is outlined in State Compliance Policy 5.7.

Assurance of state posting of the request for public comment and notification of affected LWDBs: DETR provided public review and comment of this waiver on January 9, 2026 through February 9, 2026. The proposed waiver in compliance with Nevada statutory requirements was reviewed and responses were developed for all comments received. DETR notified all Boards of the waiver submission and sought their input before submitting this request to USDOL ETA.

- Waiver #2 Approved: November 13, 2020 (PY2020)
    - This waiver is approved through June 30, 2021.

- Waiver #2 Extension Approved: June 29, 2021 (PY2020)
    - This waiver is approved through June 30, 2022.
- Waiver #2 Approved: June 7, 2022 (PY2022 & 2023)
    - This waiver is approved through June 30, 2024.
- Waiver #2 Extension Approved: May 30, 2024 (PY2023)
    - This waiver is approved through June 30, 2026.

Waiver #3: Out of School Youth (OSY) – WIOA sec. 129(a)(4); 20 CFR §681.410

DETR requested a waiver of the requirements of the Workforce Innovation and Opportunity Act (WIOA) Section 129 (a)(4) and 20 CFR 681.410 that mandate a minimum of 75 percent of youth funds be used to serve OSY. DETR requested a waiver to allow Nevada the flexibility to reduce the OSY funding requirement to a minimum of 50 percent.

Utilization of the ISY waiver in Nevada has allowed ISY enrollments to maintain 22% of total enrollments. ISY represented 24 % of active youth participants. Approximately 45% of the participants served identify as African American/Black; American Indian; Asian; Hawaiian/Other Pacific Islander; or more than one race with 48% identifying as Hispanic or Latino. The participants had the following barriers: 8.1% re-entry; 47.3% basic skills deficient (BSD); and 46.5% persons with a disability. High School diploma rates for ISY were 41.3% compared to OSY drop-out recovery diploma rates of 16.3%. Also entered employment was 82.6% for ISY as compared to 65.0% for OSY drop-out recovery. The state is requesting an extension through June 30, 2028.

This waiver supports key USDOL policy priorities by promoting secondary and postsecondary educational attainment, expanding access to education, training, employment, and support services for at-risk in-school youth, and strengthening the development of career pathways aligned with in-demand occupations identified by the DOL and OWINN. Nevada determined that local areas benefit from this OSY waiver because in-school youth programs consistently produce higher-quality educational outcomes, and increased educational attainment is strongly correlated with long-term earnings and improved employment outcomes.

Nevada has frequently the highest drop-out rates in the nation. For 2017/18, Nevada recorded a statewide drop-out rate for 9th through 12th grade students of 3.1 percent followed by 2.7 percent for 2018/19, for the Clark County School District which is the fifth largest in the nation; the respective rates were 3.4 and 3.0 percent. Addressing the challenges which at-risk ISY face, reduce the dropout rate thereby reducing the number of OSY in need of WIOA services.

Engagement of additional ISY through the increased availability of WIOA funding provides them with additional education and training resources enabling them to both enter career oriented economically self-sufficient work and pursue additional postsecondary opportunities. Specific services that can be provided through WIOA include on the job training (OJT) and work experience (WEX) opportunities which should decrease the number of youths dropping out or otherwise failing to obtain a secondary credential. These activities also allow participants to gain the hard and soft work skills necessary for successful integration into the workplace.

While the state and local districts have made significant progress addressing the drop-out rate, this situation is an area of continued concern for education administrators and elected officials at both levels. Businesses, the State Board working through the OWINN and other workforce system participants also recognize the issue as negatively impacting efforts to develop the labor force necessary to grow and diversify the state economy. Local and state agencies are attempting to address the problem but are often limited in scope and program design and additional resources provided through increased ISY funding will augment and improve their results. County school districts have developed local programs to help alleviate the situation. The Governor’s Office provides significant support to the Jobs for Nevada’s Graduates (J4NVG) program including the use of Governor’s reserve (WIOA) funds, and the State Department of Education has developed ongoing programs and initiatives addressing issues including distance learning, homelessness, and competency-based learning intended to increase the number of students obtaining secondary credentials.

Nevada has consistently exceeded OSY expenditure requirements, and since the implementation of WIOA, local workforce development boards have worked diligently to shift the system from an ISY-dominant model to one focused on OSY. Several factors have contributed to the continued low ISY expenditure rates, including the original WIOA implementation strategy, which emphasized containing ISY spending; procurement designs that have primarily targeted OSY services; and the overall shift of resources toward OSY, which has reduced system capacity to engage and recruit ISY within schools.
This waiver provides additional tools to both state and local, public, and private, service providers and administrators to

address Nevada's situation. The reduction allows the local areas to continue serving the OSY population while also increasing the ability to meet the needs of ISY in alignment with WIOA's intent by supporting career pathways and the preparation of young people for in-demand careers in the workforce, regardless of a youth's school status.

DETR recognizes the need to continue to prioritize service to OSY and pursues strategies including youth and adult co-enrollment, seek to partnerships with other agencies including adult education, and remains in compliance with all programs and reporting requirements.

The State of Nevada and the Local Boards (Nevadaworks that serves northern Nevada, and Workforce Connections that serves the southern four counties of the state) also recognize their continued responsibility to address the needs of OSY. The state monitors the Local Boards to ensure compliance with the modified funding apportionment, to provide effective, quality service to both ISY and OSY participants, and ensures all other statutory and regulatory requirements are met by the Local Boards, one-stop operators, and client service providers.

During PY2024 utilization of the ISY waiver in Nevada has allowed ISY enrollments to maintain 22% of total enrollments. ISY represented 24 % of active youth participants. Approximately 45% of the participants served identify as African American/Black; American Indian; Asian; Hawaiian/Other Pacific Islander; or more than one race with 48% identifying as Hispanic or Latino. The participants had the following barriers: 8.1% re-entry; 47.3% basic skills deficient (BSD); and 46.5% persons with a disability. High School diploma rates for ISY were 41.3% compared to OSY drop-out recovery diploma rates of 16.3%. Also entered employment was 82.6% for ISY as compared to 65.0% for OSY drop-out recovery.

Projected programmatic outcomes from waiver: This waiver extension permitted the Local Boards the opportunity to determine how best to meet the educational and training needs of youth, regardless of school status, and specific to the population, geographical location, and the economic and employment conditions of each workforce area. Nevada is a majority/minority state, both Boards are responsible for serving urban and rural populations, both have areas of extreme poverty and significant English language learner populations. This waiver allows Nevada to efficiently target all at-risk youth, meet the revised expenditure targets and negotiated performance measures for this client population. . If Nevada were to shift $1.0 million from OSY expenditures to ISY expenditures to enroll 125 additional ISY because of the waiver the expected results would be as follows:

WIOA School Status at Exit	ISY	OSY	Increase/ (Decrease)
Drop-Outs	0	-68	-68
Diploma / GED	125	-57	+68
Entered Post-Secondary	15	0	15

Current Performance: Actual results were as follows:

Enrollments July 2022 through June 2025

Population	PY22	PY23	PY24
ISY	303	189	146
OSY	935	582	522
Grand Total	1,238	771	668
WIOA Status at Exit PY23 and PY24	ISY	OSY	Total

Population	PY22	PY23	PY24
In-School, Secondary or Less	133	23	156
Secondary Drop-Out	5	94	99
Diploma or GED	98	594	692
In-School, Post-Secondary	32	3	35
Grand Total	268	714	982

Enrollments for PY23 and PY24 show a 23% split between In-School Youth (ISY) and Out-of-School Youth (OSY).

When examining the results for PY23 and PY24:

1. ISY Drop-Out Rates: These rates decreased from 5 to 0%. Additionally, the percentage of youth continuing on to postsecondary education decreased slightly from to 13% from 12%.
2. Persistence Rates for ISY: Persistence rates, reflecting the number of youth who stay engaged but have not yet achieved an educational outcome, decreased to 56% from 60%.

In contrast, for OSY in 2022:

1. OSY Drop-Out Rates: These rates decreased from to 64% to 55%. Moreover, the percentage of OSY continuing to postsecondary education stayed steady at less than 1%.
2. Persistence Rates for OSY: Persistence rates for OSY decreased from 51%% to 40%%. Since Dropout rates decreased and diploma rates increased, this suggests a higher level of engagement among OSY in achieving educational outcomes despite the challenges they faced.

During PY2024 utilization of the ISY waiver in Nevada has allowed ISY enrollments to maintain 22% of total enrollments. ISY represented 24 % of active youth participants. Approximately 45% of the participants served identify as African American/Black; American Indian; Asian; Hawaiian/Other Pacific Islander; or more than one race with 48% identifying as Hispanic or Latino. The participants had the following barriers: 8.1% re-entry; 47.3% basic skills deficient (BSD); and 46.5% persons with a disability. High School diploma rates for ISY were 41.3% compared to OSY drop-out recovery diploma rates of 16.3%. Also entered employment was 82.6% for ISY as compared to 65.0% for OSY drop-out recovery.

Nevada recognizes that, despite the challenges faced by ISY in terms of educational outcomes during the pandemic, there remains a significant benefit in serving ISY youth at a higher level. As stated earlier, ISY youth outperform OSY in terms of diploma rates and their transition to postsecondary education. Historically, individuals with high school diplomas, as compared to high school equivalencies, earn more and progress to higher levels of education, underscoring the importance of supporting ISY youth comprehensively.

Individuals, groups or populations impacted by the proposed waiver: DETR intends for this waiver to benefit the large number of at-risk ISY in Nevada. It will reduce barriers to education, training, and employment and will continue to serve OSY as a priority population as required by WIOA. Nevada expects to enroll 125 fewer OSY because of the proposed waiver.

Long term benefit to ISY participants: Based on Census data, noted above, long term educational achievement outcomes not measured by WIOA are projected to be as follows: **Highest Educational Level Achieved**	**ISY**	**OSY**	**Inc/(DEC)**
Diploma/ GED	225	(86)	139
Some College	89	(32)	57
Bachelor's or higher	75	(4)	71
Median Monthly Earnings			
Diploma/ GED	$724,950	($249,869)	$475,081
Some College	$338,045	($103,724)	$234,321
Bachelor's or higher	$470,984	($19,916)	$451,068

Procedure for monitoring progress of waiver implementation/collection of outcome information: DETR continues monitoring state and local area performance to assess the effectiveness of this waiver using both state and federal accountability systems to ensure that all negotiated performance measures are met including expenditure percentages, results are accurately reported and will provide necessary technical assistance to the Local Boards, one-stop operators and service providers. DETR's monitoring policy is outlined in State Compliance Policy 5.7.

Assurance of state posting of the request for public comment and notification of affected LWDBs: DETR provided public review and comment of this waiver on January 9, 2026 through February 9, 2026. The proposed waiver in compliance with Nevada statutory requirements was reviewed and responses were developed for all comments received. DETR notified all Boards of the waiver submission and sought their input before submitting this request to USDOL ETA.

- Waiver #3 Approved: June 20, 2020 (PY2019)
    - This waiver is approved for PY2019 and PY2020
- Waiver #3 Approved: June 29, 2021 (PY2020)
    - The waiver is approved for PY2021 which includes the entire time for which the State is authorized to spend PY 2021 funds.
- Waiver #3 Approved: June 7, 2022 (PY 2021)
    - This waiver is approved through June 30, 2024
- Waiver #3 Extension Approved: May 30, 2024 (PY2023)
    - This waiver is approved for PY2025 and PY2026.

Waiver #4: Funds Flexibility - Rapid Response and Governor's Reserve – WIOA Sec. 189(i)(3)(B); 20 CFR §679.620

Pursuant to the Workforce Innovation and Opportunity Act (WIOA) Title I waiver authority (WIOA Sec. 189(i)(3)(B); 20 CFR §679.620; TEGL 8-18 and subsequent guidance), DETR, the designated state workforce agency for the State of Nevada, requests a waiver of the requirements at WIOA Sections 133(a)(2) and 134(a)(2)(A). Specifically, Nevada requests flexibility to use up to 50 percent of funds reserved by the Governor for statewide Rapid Response activities to also support statewide employment and training activities during the first year of fund availability.

Under current statute, unspent Rapid Response funds may be used for Governor's Reserve activities only after the first year of availability. This waiver would allow Nevada to deploy a portion of these funds earlier, provided that the use advances innovation and modernization of the workforce development system or otherwise benefits jobseekers and employer customers.

This is a statewide waiver request for PY2026 and PY2027, through June 30, 2028. The waiver aligns with Nevada's Unified State Plan goals related to rapid reemployment, sector strategies, employer engagement, and the expansion of work-based learning and upskilling opportunities for both jobseekers and incumbent workers.

The primary goals of this waiver are to increase the State's ability to respond quickly and flexibly to workforce disruptions, including layoffs, economic transitions, and emerging industry needs, while accelerating investments in statewide employment and training strategies that support business recovery, growth, and talent pipeline development. It also aims to modernize and innovate service delivery by aligning Rapid Response resources with broader workforce system strategies earlier in the funding cycle. Together, these goals directly support Nevada's Unified State Plan priorities, such as strengthening sector partnerships, expanding career pathways in high-demand industries, supporting incumbent worker upskilling, and improving employment and earnings outcomes for workers affected by economic change.

There are no State of Nevada statutory or regulatory barriers that impede implementation of this waiver. Nevada has a demonstrated history of effectively using the Governor's Reserve to support innovative pilot initiatives that advance Industry Sector Partnerships, including flexible approaches to incumbent worker training, strategies that engage and align employers with secondary and postsecondary education systems, and targeted pilots serving opportunity youth and disconnected youth.

These efforts have strengthened career pathways, improved business engagement, expanded access for priority populations, and enhanced coordination across education and workforce partners.

DETR has reviewed relevant state policies and confirmed that existing compliance, fiscal, and oversight controls are sufficient to support the proposed flexibility. DETR will issue formal guidance to LWDBs to ensure consistent implementation, fiscal integrity, and continued adherence to all applicable federal requirements.

Projected programmatic outcomes from waiver: The waiver is expected to improve results in the following outcomes:

1. Increased flexibility to deploy statewide workforce resources in support of employer-driven strategies and Industry Sector Partnerships;

2. Expanded participation in education, training, upskilling, and work-based learning initiatives, including flexible incumbent worker training models aligned with industry needs;

3. Stronger alignment between employer engagement, business services, and education and training systems, including secondary and postsecondary partners; and

4. Improved employment, retention, credential attainment, and earnings outcomes for participants.

Nevada anticipates that earlier access to flexible statewide funding will strengthen employer engagement, accelerate the implementation of sector-based training strategies, and improve workforce system responsiveness to evolving industry needs, resulting in more timely and higher-quality employment outcomes for both workers and businesses.

This waiver supports the USDOL's workforce policy priorities by strengthening employer engagement through earlier use of Rapid Response funds, allowing Nevada to address employer identified skill gaps and advance business led solutions. It also enhances the connection between education and training strategies by integrating Rapid Response activities with sector partnerships and training providers, ensuring faster transitions from layoffs to reemployment or upskilling. In addition, the waiver supports the expansion of work-based learning, such as on the job and customized training, directly linking workers to employers. By enabling earlier investment in training, it improves job and career outcomes, reducing time to reemployment and increasing access to higher quality jobs with advancement potential. Finally, the waiver advances innovation and modernization by allowing flexible, data driven resource deployment to pilot new approaches, update service delivery, and better align funding with real time labor market needs.

The waiver will primarily benefit incumbent workers who need upskilling to remain competitive in evolving industries, opportunity youth ages 16 to 24 who are neither in school nor employed, and individuals facing barriers to employment, including low-income individuals, those with limited skills, and workers affected by economic shocks. It will also support employers, particularly small and mid-sized businesses, that require timely workforce solutions. By enabling earlier access to training resources, the waiver strengthens service delivery for populations disproportionately affected by economic disruption and structural shifts in the labor market.

Procedure for monitoring progress of waiver implementation/collection of outcome information: DETR will monitor progress of waiver implementation through existing state and federal performance accountability systems, fiscal oversight, and program monitoring in accordance with State Compliance Policy 5.7.

Assurance of state posting of the request for public comment and notification of affected LWDBs: DETR provided public review and comment of this waiver on January 9, 2026, through February 9, 2026. The proposed waiver in compliance with Nevada statutory requirements was reviewed and responses were developed for all comments received. DETR notified all Boards of the waiver submission and sought their input before submitting this request to USDOL ETA.

This waiver will enhance Nevada's ability to deploy workforce resources strategically and responsively, strengthening the State's capacity to serve workers and employers during periods of economic change while advancing innovation and modernization of the workforce development system.

All LWDBs will be formally notified of the waiver request and provided implementation guidance upon approval. Additionally, all LWDBs participated in the development of the proposed waiver.

Waiver #5: Post-Exit Supportive Services for Employment Retention – WIOA Sec. 189(i)(3)(B); 20 CFR §679.620

Pursuant to the Workforce Innovation and Opportunity Act (WIOA) Title I waiver authority (WIOA Sec. 189(i)(3)(B); 20 CFR §679.620; TEGL 8-18 and subsequent guidance), DETR, the designated state workforce agency for the State of Nevada, requests a waiver of WIOA Section 134(d)(2) and 20 CFR §680.910.

These provisions limit the use of supportive services for Adult and Dislocated Worker program participants to those services necessary to enable participation in career or training services and do not authorize the provision of supportive services during the 12-month period following program exit. Nevada requests flexibility to allow the provision of targeted, short-term supportive services to eligible Adult and Dislocated Worker participants within 12 months of exit for the purpose of employment retention.

This is a statewide waiver request for PY2026 and PY2027, through June 30, 2028, and applies to exited participants who have successfully obtained employment and are recipients of public assistance or otherwise at risk of benefit cliffs during the transition to sustained employment.

The primary goals of this waiver are to support employment retention and wage progression for Adult and Dislocated Worker participants after they exit the program, mitigate the negative effects of benefit cliffs and income volatility as individuals transition from public assistance to earned income, reduce early job loss driven by short term financial instability, and improve long term employment and earnings outcomes.

These objectives align with Nevada's Unified State Plan priorities to expand labor force participation, enhance job quality and retention, and promote economic self-sufficiency for individuals facing barriers to employment.

There are no State of Nevada statutory or regulatory barriers that impede implementation of this waiver. Nevada has experience administering supportive services in a targeted, time-limited manner and coordinating workforce services with public assistance programs to support employment stability.

DETR has reviewed relevant state policies and confirmed that existing compliance, fiscal, and oversight controls are sufficient to support the proposed flexibility. DETR will issue formal guidance to LWDBs to ensure consistent eligibility determination, allowable cost controls, and appropriate documentation of post-exit supportive services.

Projected programmatic outcomes from waiver: The waiver is expected to improve results in the following outcomes:

1. Increased employment retention rates during the second and fourth quarters after exit;
2. Reduced job separations related to transportation, childcare, housing instability, or other short-term financial barriers;
3. Improved wage progression and reduced reliance on public assistance; and
4. Stronger connections between workforce services and broader economic stability strategies.

Nevada anticipates that allowing limited supportive services post-exit will stabilize employment outcomes, reduce recidivism into unemployment, and support smoother transitions to higher and more consistent earnings.

This waiver supports the USDOL's workforce policy priorities by strengthening employer engagement through improved retention outcomes, which reduce turnover costs and build employer confidence in the public workforce system. It also enhances the connection between education and training strategies by ensuring that training investments lead to sustained employment. In addition, the waiver supports work-based learning and employment success by helping participants remain attached to the workforce after placement. By increasing second and fourth quarter employment, earnings, and job stability, it contributes to stronger job and career outcomes. Finally, the waiver advances equity and system modernization by addressing benefit cliffs and income volatility through targeted, data informed interventions.

The waiver will primarily benefit Adult and Dislocated Worker participants who have exited WIOA programs and secured employment, particularly those receiving public assistance or transitioning off benefits, individuals experiencing income volatility or benefit cliffs during the early stages of employment, and those facing transportation, childcare, or short-term housing barriers. It will also support individuals with multiple employment challenges, including low income, limited savings, or recent dislocation. By providing continued support during this critical period, the waiver strengthens service continuity for populations most vulnerable to early job loss and economic instability.

To ensure strong monitoring, oversight, and public transparency, DETR will implement the waiver through established state and federal performance accountability systems, fiscal oversight mechanisms, and program monitoring consistent with State Compliance Policy 5.7. Additionally, outcomes related to the waiver will be tracked and reported through Nevada's WIOA Annual Report, with a focus on employment retention, earnings, and other key performance measures.

Assurance of state posting of the request for public comment and notification of affected LWDBs: DETR provided public review and comment of this waiver on January 9, 2026, through February 9, 2026. The proposed waiver in compliance with Nevada statutory requirements was reviewed and responses were developed for all comments received. DETR notified all Boards of the waiver submission and sought their input before submitting this request to USDOL ETA.

This waiver will allow Nevada to strengthen employment retention strategies, address benefit cliffs, and ensure that workforce investments lead to sustained economic self-sufficiency for Adult and Dislocated Worker participants while supporting employer stability and workforce system effectiveness.

All LWDBs will be formally notified of the waiver request and provided implementation guidance upon approval. Additionally, all LWDBs participated in the development of the proposed waiver.

Waiver #6: Training Contracts Flexibility In lieu of Individual Training Accounts – WIOA Sec. 189(i)(3)(B); 20 CFR §679.620

Pursuant to the Workforce Innovation and Opportunity Act (WIOA) Title I waiver authority (WIOA Sec. 189(i)(3)(B); 20 CFR §679.620; TEGL 8-18 and subsequent guidance), DETR, the designated state workforce agency for the State of Nevada, requests a waiver of WIOA Sections 134(c)(3)(F)(i) and 134(c)(3)(G), and 20 CFR §§680.320(a) and 680.340(a).

These provisions establish consumer choice requirements and generally require the use of Individual Training Accounts (ITAs) for the delivery of training services. Nevada requests flexibility to allow LWDBs to provide all training services through training contracts when such training is directly aligned to employer-validated needs, Industry Sector Partnerships, or other industry-driven strategies.

This is a statewide waiver request for PY2026 and PY2027, through June 30, 2028. The waiver does not eliminate ITAs as a service option; rather, it provides local areas with the flexibility to deploy training contracts as the primary mechanism for delivering training services where contracted models better ensure alignment with employer demand and direct employment outcomes.

The primary goals of this waiver are to strengthen employer driven and industry led workforce strategies by allowing training services to be delivered through contracts aligned with documented employer demand, increase the use and effectiveness of work based training models such as on the job training, customized training, incumbent worker training, pre apprenticeship, and Registered Apprenticeship, and improve the quality, consistency, and employment outcomes of training investments. It also aims to ensure that training leads directly to employment opportunities through job placement commitments, interview guarantees, or other employer validated mechanisms.

Together, these goals support Nevada's Unified State Plan priorities to expand Industry Sector Partnerships, enhance employer engagement, modernize service delivery, and improve employment and earnings outcomes for jobseekers.

There are no State of Nevada statutory or regulatory barriers that impede implementation of this waiver. Nevada has an established history of using training contracts, Governor's Reserve investments, and sector-based strategies to deliver employer-validated training aligned with workforce demand.

DETR has reviewed relevant state policies and confirmed that existing procurement, fiscal, and oversight controls are sufficient to support the expanded use of training contracts. DETR will issue formal guidance to LWDBs outlining allowable uses, documentation requirements, and safeguards to ensure training contracts meet federal standards for effectiveness, accountability, and equity.

Projected programmatic outcomes from waiver: The waiver is expected to improve results in the following outcomes:

1. Significant increases in the utilization of work-based training strategies, including OJT, customized training, and incumbent worker training;

2. Increased enrollment of participants in pre-apprenticeship and Registered Apprenticeship programs;

3. Improved employment placement, retention, and earnings outcomes as training is directly connected to employer needs; and

4. Reduced mismatch between training completion and employment opportunities.

Nevada anticipates that expanded use of training contracts will improve return on investment for training funds by prioritizing programs with explicit employer validation, job guarantees, interview guarantees, or other mechanisms that ensure training leads directly to employment.

This waiver supports the U.S. Department of Labor's workforce policy priorities by strengthening employer engagement through contracted partnerships that allow employers to co design and validate training programs. It enhances the connection between education and training strategies by aligning training providers, apprenticeship sponsors, and employers around shared workforce outcomes. The waiver also expands access to work-based learning, including on the job training, customized training, incumbent worker training, and apprenticeship pathways. By tightly linking training to available jobs, it improves placement rates, retention, and earnings. Finally, it advances innovation and modernization by enabling flexible, performance driven contracting models that increase system responsiveness and accountability.

This waiver will benefit Adult, Dislocated Worker, and eligible Youth participants who need training that leads directly to employment, with advantages for individuals facing barriers to work who rely on structured, employer connected training models. These include people with limited work experience, dislocated workers transitioning into new industries, opportunity and disconnected youth, and incumbent workers seeking upskilling aligned with employer demand. By prioritizing training approaches that offer clear employment outcomes, the waiver strengthens equity and expands access to high quality training opportunities.

To ensure strong monitoring, oversight, and public transparency, DETR will implement this waiver through established state and federal performance accountability systems, fiscal oversight, and program monitoring in accordance with State Compliance Policy 5.7. In addition, outcomes associated with the waiver, such as training participation, work based learning utilization, and employment results, will be tracked and reported through Nevada's WIOA Annual Report.

Assurance of state posting of the request for public comment and notification of affected LWDBs: DETR provided public review and comment of this waiver on January 9, 2026, through February 9, 2026. The proposed waiver in compliance with Nevada statutory requirements was reviewed and responses were developed for all comments received. DETR notified all Boards of the waiver submission and sought their input before submitting this request to USDOL ETA.

This waiver will allow Nevada to strengthen employer-driven workforce strategies, expand work-based learning and apprenticeship pathways, and ensure that training investments are directly connected to employment opportunities that support long-term economic mobility and workforce system effectiveness.

All LWDBs will be formally notified of the waiver request and provided implementation guidance upon approval. Additionally, all LWDBs participated in the development of the proposed waiver.

Waiver #7: Youth Program Elements Flexibility – WIOA Sec. 189(i)(3)(B); 20 CFR §679.620

Pursuant to the Workforce Innovation and Opportunity Act (WIOA) Title I waiver authority (WIOA Sec. 189(i)(3)(B); 20 CFR §679.620; TEGL 8-18 and subsequent guidance), DETR, the designated state workforce agency for the State of Nevada, requests a waiver of the requirements at WIOA Section 129(c)(2), which requires each local workforce development area to make all fourteen (14) youth program elements available to eligible youth.

This is a statewide waiver request for PY2026 and PY2027, through June 30, 2028. The waiver would allow LWDBs flexibility to prioritize youth program elements based on local labor market conditions, participant needs, and employer demand, rather than requiring all fourteen elements to be available in every local area.

The primary goals of this waiver are to increase local flexibility so youth investments can be aligned with in demand occupations and regional industry needs, expand access to high quality work experiences such as paid and unpaid work experience, pre apprenticeships, Registered Apprenticeships, and other work based learning models, increase the availability of occupational skills training through Individual Training Accounts, and advance educational and career pathways for youth beyond traditional secondary education.

These goals support Nevada's Unified State Plan priorities to strengthen career pathways, deepen employer engagement through Industry Sector Partnerships, and improve education, training, and employment outcomes for youth and young adults.

There are no State of Nevada statutory or regulatory barriers that impede implementation of this waiver. Nevada has a demonstrated history of effectively using available WIOA flexibilities to support innovative youth-focused pilots and strategies aligned with employer demand, Industry Sector Partnerships, and work-based learning models.

DETR has reviewed relevant state policies and confirmed that existing compliance, fiscal, and oversight controls are sufficient to support the proposed flexibility. DETR will issue formal guidance to LWDBs to ensure consistent implementation, fiscal integrity, and continued adherence to all applicable federal requirements.

Projected programmatic outcomes from waiver: The waiver is expected to improve results in the following outcomes:

1. Increased investment in work experience activities beyond the minimum 20 percent expenditure requirement, including pre-apprenticeships and Registered Apprenticeships;

2. Expanded access to occupational skills training through ITAs aligned with in-demand industries;

3. Stronger alignment between youth services, employer engagement strategies, and Industry Sector Partnerships; and

4. Improved educational attainment, credential attainment, employment, retention, and earnings outcomes for youth participants.

Nevada anticipates that this flexibility will allow local areas to tailor youth service delivery to maximize impact, reduce fragmentation, and focus resources on strategies with the strongest connections to career pathways and long-term economic self-sufficiency.

This waiver supports the USDOL's workforce policy priorities by strengthening employer engagement, allowing local areas to direct youth resources toward employer driven work experiences and training aligned with Industry Sector Partnerships. It enhances connections between education and training strategies by reinforcing linkages among secondary and postsecondary institutions, training providers, and employers. The waiver also expands access to work-based learning, including work experiences, pre apprenticeships, and Registered Apprenticeships that equip youth with real world skills and employer connections. By increasing access to credentials, work experience, and employment opportunities that support career advancement, it improves job and career outcomes. Finally, it advances innovation and system modernization by enabling local workforce systems to deploy resources more strategically and responsively based on participant needs and labor market conditions.

This waiver will primarily benefit eligible youth statewide, including ISY, OSY, opportunity youth, and disconnected youth. The flexibility will allow local areas to prioritize services for youth with barriers to employment, including low-income youth, youth with limited work experience, youth involved in the justice system, youth experiencing homelessness, and youth aging out of foster care. By focusing resources on work-based learning and occupational training, the waiver enhances access to high-quality services that support successful transitions to postsecondary education, training, and employment.

To ensure strong monitoring, oversight, and public transparency, DETR will implement this waiver through established state and federal performance accountability systems, fiscal oversight, and program monitoring in accordance with State Compliance Policy 5.7. In addition, outcomes associated with the waiver will be tracked and reported through Nevada's WIOA Annual Report.

Assurance of state posting of the request for public comment and notification of affected LWDBs: DETR provided public review and comment of this waiver on January 9, 2026, through February 9, 2026. The proposed waiver in compliance with Nevada statutory requirements was reviewed and responses were developed for all comments received. DETR notified all Boards of the waiver submission and sought their input before submitting this request to USDOL ETA.

This waiver will provide Nevada with the flexibility needed to focus youth investments on high-impact strategies that strengthen employer engagement, expand work-based learning, and support youth in achieving meaningful education and employment outcomes aligned with the State's workforce and economic development priorities.

All LWDBs will be formally notified of the waiver request and provided implementation guidance upon approval. Additionally, all LWDBs participated in the development of the proposed waiver.

The following applies to all current waivers:

Actions for the removal of state or local statutory or regulatory barriers: There are no State of Nevada or local statutory or regulatory barriers to implementation. DETR compliance policies meet current federal program requirements.

2026 State Plan Waivers – NV Additional Information Request

In the 2026 State Plan submission, the federal review of the waiver section identified areas requiring additional information in your request. Please review and provide additional information to the state plan portal for the following areas related to your waiver request.

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).

- Please specify whether the State is requesting this waiver for local area funds, statewide funds, or both.

The Nevada Department of Employment, Training and Rehabilitation (DETR) requests continuation of the previously approved waiver of the requirements under WIOA Section 129(a)(4)(A) and 20 CFR 681.410, which mandate that a minimum of 75 percent of youth funds be expended on out-of-school youth (OSY). Nevada seeks to maintain flexibility to reduce this expenditure requirement to a minimum of 50 percent. This request applies to both statewide (Governor's Reserve) youth funds and local area youth formula funds.

Nevada's request aligns with U.S. Department of Labor priorities to expand secondary and postsecondary credential attainment, strengthen access to education, training, employment, and support services for at-risk in-school youth (ISY), and support the development of career pathways aligned with in-demand industries identified by DOL and the Governor's Office of Workforce Innovation (OWINN). The waiver continues to be essential to ensure Nevada's local workforce development boards can target service strategies that best address the needs of their diverse populations and local labor market conditions.

Nevada has determined that local areas benefit significantly from this flexibility. ISY programming consistently demonstrates higher-quality educational outcomes, and increased educational attainment is strongly associated with improved long-term employment and earnings. Nevada has historically faced some of the highest high school drop-out rates in the country. Strengthening services to at-risk ISY contributes directly to reducing drop-out rates, thereby decreasing the number of youth who ultimately require OSY services.

Expanding access to WIOA resources for ISY allows Nevada to provide meaningful education and training options, including work experience (WEX), on-the-job training (OJT), and other career readiness opportunities, that reduce drop-out risk and support both immediate labor force attachment and long-term educational progress. These services build essential hard and soft skills and support successful transition into the workforce and postsecondary programs.
While Nevada and its school districts have made progress in reducing drop-out rates, this challenge continues to be a major concern for educators, state and local policymakers, and employers. The workforce system, OWINN, and business and community partners recognize

that persistent drop-out levels hinder efforts to develop the talent pipeline needed to strengthen and diversify the state's economy. Although local districts have developed targeted programs, many face resource limitations. Increased flexibility under this waiver bolsters these initiatives and improves overall service capacity.

Nevada has demonstrated consistent success in meeting and exceeding OSY expenditure requirements. Since WIOA implementation, state and local boards (Nevadaworks in the north and Workforce Connections in the south) have worked diligently to transition from ISY-dominant programming to OSY-dominant models. However, several factors, including early strategies to limit ISY spending and procurement models centered on OSY, have constrained ISY engagement capacity. This waiver expands the tools available to state and local partners and supports a balanced approach that remains consistent with WIOA's intent of preparing all youth for career pathways leading to in-demand occupations.

DETR recognizes the ongoing priority of serving OSY and will continue strategies such as youth-adult co-enrollment, partnership development with Adult Education and other agencies, and rigorous monitoring to ensure compliance with modified expenditure levels. The State will continue to oversee Local Board performance, ensuring high-quality service delivery and adherence to all statutory and regulatory requirements.

Projected Programmatic Outcomes
The waiver enables Local Boards to determine the most effective mix of ISY and OSY services based on population needs, geography, and local economic conditions. Nevada is a majority-minority state with substantial rural regions, areas of significant poverty, and notable English language learner populations. This flexibility supports the State's ability to target services effectively, improve educational and employment outcomes, and meet negotiated WIOA performance measures for youth.

Waiver of the requirements of WIOA Sections 133(a)(2) and 134(a)(2)(A) to allow flexibility to use up to 50 percent of funds reserved by the Governor to provide statewide rapid response activities under WIOA Section 134(a)(2)(A) to also provide statewide employment and training activities in the first year of funding availability.

- Please describe the State's historical use of Rapid Response funds and whether they are typically expended within the first year of availability

Nevada historically obligates and expends the majority of its Rapid Response (RR) funds within the first year of availability. The State consistently experiences ongoing layoff activity, both individual events and industry-wide fluctuations that require deployment of RR resources for early intervention, employer engagement, and direct support to affected workers.

While most RR funds are used in the first year, Nevada intentionally retains a modest portion of first-year funds to ensure adequate response capacity for unanticipated layoffs or closures. In addition to this contingency reserve, Nevada also plans and reserves remaining second- and third-year RR availability to support Governor's Reserve projects that advance statewide workforce priorities, including sector partnerships, innovative training models, and workforce modernization initiatives.

Under current statutory limitations, RR funds not expended in the first year may only be used for Governor's Reserve activities in the second year of availability, which can result in end-of-year balances that cannot be deployed earlier, even when strategic statewide workforce priorities would benefit from timely investment.

The requested waiver would not reduce Nevada's ability to meet RR obligations. Instead, it would provide flexibility to use up to 50 percent of RR funds in the first year for statewide employment and training activities, only after ensuring sufficient resources remain available to address projected and emergent layoff activity and to maintain planned reserves to support year-two and year-three Governor's Reserve projects.

- How will the State address layoffs that will require use of Rapid Response funding, if the waiver is approved

Nevada will continue to prioritize and fully fund all required Rapid Response activities, consistent with WIOA Section 134(a)(2)(A) and TEGL 19-16. Approval of this waiver will not diminish the State's statutory responsibility or operational readiness to address layoffs.

To ensure full RR capacity, the State will:

- Maintain a base level of RR funds sufficient to meet projected statewide layoff trends, informed by historical expenditure patterns, WARN data, and real-time economic indicators.
- Reserve additional contingency RR funds within the first program year to ensure rapid and effective response to unexpected or large-scale dislocation events.
- Conduct ongoing fiscal monitoring to ensure adequate RR funds remain available for all required activities before authorizing any flexible use of the up-to-50-percent allocation.
- Implement internal controls and decision-making thresholds requiring documented confirmation of RR capacity prior to the release of funds for employment and training activities under the waiver.

These safeguards ensure that Nevada can meet all RR obligations while also supporting innovation and modernization of statewide workforce strategies. If RR demand increases at any point during the year, Nevada will adjust planned expenditures under the waiver to ensure uninterrupted RR services.

- Please provide projected outcomes resulting from the implementation of this waiver, specifically what the targeted results for businesses and opportunity youth they hope to achieve

  This section provides projected programmatic outcomes associated with the Governor's use of up to 50 percent of Rapid Response (RR) funds for statewide employment and training activities in the first year of funding availability, as authorized under the requested waiver. Projections are grounded in demonstrated cost efficiency from two active Governor's Reserve initiatives: the "Next Stop: Your Career" opportunity youth program and the Industry Sector Partnership (ISP) Work Ready Funds employer investment program, both of which reflect the types of activities Nevada anticipates supporting with waiver-enabled funds.

  Because RR fund allocations vary by program year formula and are not fixed in advance, all projections are expressed as outcomes per dollar of waiver-enabled expenditure rather than as fixed participant counts. This approach provides a transparent, auditable basis for evaluating waiver effectiveness regardless of the actual allocation in any given program year, and reflects the conservative framing requested by DETR.

  Nevada projects the following targeted results from the use of up to 50 percent of Rapid Response funds for statewide employment and training activities under this waiver. Projected outcomes are expressed separately for the two program types supported by waiver-enabled expenditure, and are stated as rates per dollar to reflect that actual RR allocations vary by program year formula.

  Opportunity Youth Program (40% of waiver-enabled funds)
  For every \$100,000 directed to opportunity youth activities, Nevada projects enrollment of approximately 22 disconnected youth participants at a conservative cost of \$4,500 per participant — a 20 percent buffer above PY2024 program actuals. Of those enrolled, a minimum of 60 percent, or approximately 13 participants per \$100,000 expended, are projected to achieve a positive placement outcome into unsubsidized employment or postsecondary education or training. Under a hypothetical allocation of \$120,000 (40 percent of \$300,000 in total waiver-enabled funds), Nevada projects a minimum of 26 youth enrolled and 15 placed.

  Employer Workforce Development Program (60% of waiver-enabled funds)
  For every \$100,000 directed to employer workforce investment activities, Nevada projects training of approximately 56 incumbent workers across an estimated 13 employer partnerships, at a conservative cost of \$1,800 per worker — a 20 percent buffer above PY2024 ISP reimbursed actuals. Under a hypothetical \$180,000 (60 percent of \$300,000 in total waiver-enabled funds), Nevada projects a minimum of 100 incumbent workers

trained, 23 employers receiving workforce investment agreements, and engagement across at least 5 distinct industry sectors consistent with Nevada's economic diversification priorities.

Base Case and Scaling

Under a base case of $300,000 in total waiver-enabled expenditure — representing 50 percent of an estimated $600,000 Rapid Response allocation — the two programs combined are projected to serve a minimum of 126 individuals: 26 opportunity youth and 100 incumbent workers. All projections scale linearly with actual waiver-enabled expenditure. Rapid Response core layoff response activities retain the remaining 50 percent of the RR allocation in all scenarios, ensuring full compliance with Nevada's statutory obligations under WIOA Section 134(a)(2)(A). See below for a discussion of actual program outcomes associated with the use of Governor’s Reserve funds.

An example of outcomes associated with the use of Governor’s Reserve funds to support innovative pilot programs is the “Next Stop: Your Career” initiative, which focuses on reconnecting disconnected youth ages 16–24 to the workforce. Through targeted recruitment and a comprehensive suite of services, including prevocational training, vocational instruction, work-based learning, supportive services, and on-the-job training, the program is designed to align participant skill development with the needs of southern Nevada’s key industry sectors and create a pipeline of work-ready talent for local employers.

The “Next Stop: Your Career” program significantly exceeded its enrollment and service delivery targets, enrolling 134 participants (353% of goal) and providing barrier removal services to 133 individuals (99% of participants). Participants received a range of supports, including 121 prevocational services, 81 supportive services, 37 vocational trainings, 15 work experiences, and 3 on-the-job training placements. Through strong engagement and service delivery outcomes, placement into employment or postsecondary activities has reached 33 participants (25%), with work continuing to achieve the final goal of 70%.

In addition, innovative pilots such as the Industry Sector Partnership (ISP) Work Ready Funds supported employer-driven workforce investments across Southern Nevada’s priority industries, enabling businesses to strengthen incumbent worker skills, improve workforce retention, and support advancement opportunities aligned with regional labor market demand.

During the current grant cycle, 102 employers received approved ISP funding agreements, representing participation across healthcare, advanced manufacturing, logistics, business and financial services, information and communication technologies, creative industries, and emerging clean technology-aligned trades. Through these agreements, $1,233,503.85 in workforce investments were contractually obligated, with $653,874.59 reimbursed to participating employers to date. The reimbursement-based structure of the program reflects ongoing employer training activity, with additional outcomes expected as projects reach completion.

Employer awards supported workforce development initiatives impacting 437 incumbent workers, with training focused on occupational skill development, internal career pathway advancement, and structured workforce capacity building. These investments enabled employers to implement customized training aligned with operational needs, including technical skill enhancement, supervisory development, and industry-specific credential attainment.

ISP-funded employer activities contributed to broader workforce engagement outcomes, including 418 career development activities conducted during the program year, significantly exceeding performance targets. These activities included work-based learning experiences, employer-education coordination efforts, and structured career exposure initiatives designed to strengthen long-term talent pipeline alignment.

Employer participation reflected diversified sector engagement, with the highest concentration of investments occurring in Business and Financial Services (24 employers), Creative Industries (20), Advanced Manufacturing (19), and Healthcare Services (17). Additional participation included Transportation and Logistics (8 employers), Business Services (5), Information and Communication Technologies (4), and Clean Energy-aligned industries (2). This distribution demonstrates broad utilization of ISP funding as a workforce investment tool supporting Nevada's economic diversification priorities.

The ISP Work Ready Funds model continues to demonstrate strong employer demand and effective utilization of sector-based workforce investment strategies. By enabling businesses to implement targeted training initiatives tied to operational workforce needs, the program supports workforce advancement, strengthens employer competitiveness, and contributes to the development of sustainable talent pipelines across southern Nevada's evolving economy.

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

- Please provide quantifiable projected programmatic outcomes. Specifically, in the request, the State indicates employment outcomes in Q4 will increase after exit, the state should indicate by how much it aims to improve outcomes

Projected Programmatic Outcomes
Pursuant to the waiver authority described herein, Nevada projects the following quantifiable improvements in Adult and Dislocated Worker employment outcomes for Program Years 2026 and 2027. Projections are derived from PY2024 statewide WIOA performance data, which serves as the baseline for this waiver period, and are based on the following conservative assumptions:

1. 25 percent of the measured denominator population (exited participants) will receive post-exit supportive services under the waiver;
2. 10 percent of those receiving services will achieve a positive Q4 employment retention outcome attributable to the intervention; and
3. 5 percent of those receiving services will achieve a positive Q2 employment retention outcome attributable to the intervention.

Median earnings at Q2 are not projected to change materially as a direct result of post-exit supportive services, as the primary goal of this waiver is employment retention rather than wage enhancement. Median wage outcomes will nonetheless continue to be tracked and reported.

Projection Methodology
For each population and measure, projected outcomes are calculated as follows:

- Participants served = Denominator × 25%
- New positive outcomes = Participants served × impact rate (10% for Q4; 5% for Q2)
- Projected numerator = Baseline numerator + new positive outcomes
- Projected rate = Projected numerator ÷ original denominator

Adult Program Projected Outcomes

Measure	PY2023 Actual	PY2024 Baseline	Participants Served (25%)	New Positive Outcomes	Projected Rate	Change
Q2 Employment	74.4% (1,847/2,483)	75.4% (1,395/1,850)	463 (1,850 × 25%)	23 (463 × 5%)	76.6% (1,418/1,850)	+1.2 pp
Q4 Employment	73.4% (1,879/2,560)	74.8% (1,553/2,076)	519 (2,076x25%)	52 (519x10%)	77.3% (1,605/2,076)	+2.5 pp

Dislocated Worker Program Projected Outcomes

Measure	PY2023 Actual	PY2024 Baseline	Participants Served (25%)	New Positive Outcomes	Projected Rate	Change
Q2 Employment	78.3% (203/259)	80.5% (149/185)	46 (185 × 25%)	2 (46 × 5%)	81.6% (151/185)	+1.1 pp
Q4 Employment	76.6% (223/291)	81.9% (182/222)	56 222 × 25%)	6 (56 × 10%)	84.2% (188/222)	+2.3 pp

Combined Summary

Population	Measure	Additional Individuals Employed	Rate Improvement
Adult	Q2 Employment	+23 individuals	+1.2 pp
Adult	Q4 Employment	+52 individuals	+2.5 pp
Dislocated Worker	Q2 Employment	+2 individuals	+1.1 pp
Dislocated Worker	Q4 Employment	+6 individuals	+2.3 pp
Combined total across all populations and measures		**+83 individuals**	—

Waiver Outcome Statement

Nevada projects a minimum improvement of 1.1 to 2.5 percentage points in Q2 and Q4 employment retention rates for Adult and Dislocated Worker participants who receive post-exit supportive services under this waiver. These projections are based on PY2024 statewide performance data as the baseline and assume that 25 percent of exited participants receive services, with 10 percent of those achieving a positive Q4 retention outcome and 5 percent achieving a positive Q2 outcome.

Under these assumptions, the waiver is projected to result in an estimated 83 additional individuals retaining employment across Q2 and Q4 measures statewide, including 75 Adult participants and 8 Dislocated Worker participants.

Median earnings at Q2 are not projected to change materially as a direct result of the waiver intervention. Earnings outcomes will nonetheless continue to be tracked and reported through UI wage record matching and Nevada's WIOA Annual Report.

Measurement and Reporting Framework
Outcomes will be measured and reported as follows:

- Data source: UI wage records matched to exited participant records via Nevada's case management system and Unemployment Insurance database.
- Cohort definition: All Adult and Dislocated Worker participants who exit with employment and receive at least one post-exit supportive service under the waiver.
- Comparison: Pre/post cohort comparison against PY2024 baseline rates, with disaggregated reporting by population subgroup, barrier type, and LWDB region.
- Timing: Outcomes measured at Q2 (months 4–6 post-exit) and Q4 (months 10–12 post-exit) consistent with WIOA common measures definitions.

Reporting: Outcomes tracked and reported annually through the WIOA Annual Report and ETA-9169 performance submissions, consistent with State Compliance Policy 5.7.

Waiver of WIOA Section 134(c)(3)(F)(i) and (G) and 20 CFR 680.320(a) and 680.340(a) to allow for all training services to be provided through training contracts

- Please provide quantifiable projected programmatic outcomes for those four listed outcomes in the waiver request

Projected Programmatic Outcomes
Pursuant to the waiver authority described herein, Nevada projects the following quantifiable improvements in training utilization, employment, and training-related employment outcomes for Adult, Dislocated Worker, and eligible Youth participants for Program Years 2026 and 2027. Projections are derived from PY2024 statewide WIOA performance data, which serves as the baseline for this waiver period, and are based on the following assumptions:

1. Approximately 10 percent of currently trained participants will be served through training contracts (excluding OJT) under the waiver;
2. Participants in contracted training will experience a Q2 employment rate 8 percentage points above the PY2024 trained-participant baseline, and a Q4 employment rate 5 percentage points above baseline, reflecting the direct employer-validation and placement commitments embedded in training contracts;
3. Participants in contracted training will achieve a training-related employment rate of 75 percent, compared to the PY2024 baseline of 36.8 percent of Q2-employed trained participants, reflecting the structural alignment between contracted training and specific employer job openings; and
4. OJT enrollments will increase by a minimum of 20 percent over the PY2024 baseline as a result of reduced administrative friction and expanded employer-validated slot availability under the contracted training model.

The overall employment rate for all trained participants (contracted and ITA-served combined) is not projected to change materially, as the contracted cohort represents approximately 10 percent of the trained population. Improvements are concentrated within the contracted cohort and reported both at the cohort level and as a blended system-wide rate.

Projection Methodology

For Outcomes 3 and 4, projections are calculated at the cohort level and then blended across the full trained-participant population as follows:

- Contracted cohort (10%): Q2 participants = 1,007 × 10% = 101; Q4 participants = 1,121 × 10% = 112
- ITA / other cohort (90%): Q2 participants = 906; Q4 participants = 1,009; rates held at PY2024 baseline
- Projected employed: contracted cohort rate applied to contracted participants; ITA cohort rate held constant
- Blended rate: total projected employed ÷ total denominator
- Training-related employment rate denominator: Q2 employed numerator (not total exiters), consistent with Nevada's case management tracking methodology

Outcome 1 — Increased Utilization of Work-Based Training Strategies

Nevada projects a minimum 20 percent increase in OJT enrollments over the PY2024 baseline, returning to near-PY2023 levels. This increase reflects the expectation that training contract flexibility will reduce the administrative barriers that contributed to the decline in OJT utilization between PY2023 and PY2024 and will expand the availability of employer-validated OJT slots through contracted employer partnerships.

Measure	PY2023 actual	PY2024 baseline	Projected PY2026–27	Change
OJT enrollments	196	147	176	+20% (+29)
OJT completion rate	≥81%	≥78%	≥78%	Maintained

Note: The 20 percent increase target is calibrated to PY2023 actuals and represents a conservative floor. OJT completion rate is held at the PY2024 minimum threshold. Customized training and incumbent worker training enrollment targets will be established at the local workforce development board level consistent with regional employer demand strategies.

Outcome 2 Registered Apprenticeship and Pre-Apprenticeship Enrollment

Registered Apprenticeship and pre-apprenticeship enrollments through WIOA Title I funding were negligible in PY2024 and PY2023. While Nevada is actively expanding its apprenticeship infrastructure and expects the training contract flexibility provided by this waiver to facilitate deeper partnerships with Registered Apprenticeship sponsors, the current enrollment baseline is insufficient to support a defensible numeric projection. Nevada is committed to growing apprenticeship pathways as a component of its contracted training strategy and will establish local targets through its Local Workforce Development Board planning process. Apprenticeship enrollment outcomes will be tracked and reported through ETA-9169 and Nevada's WIOA Annual Report for PY2026 and PY2027.

Outcome 3 Employment Placement and Retention for Trained Participants

Nevada projects improved Q2 and Q4 employment rates for participants served through training contracts, reflecting the direct employer-validation and job placement commitments embedded in contracted training models. The overall trained-participant employment rate is held constant, consistent with the assumption that the contracted cohort represents approximately 10 percent of total trained participants.

Cohort	Participants	Baseline rate	Projected rate	Baseline employed	Projected employed	Change
Q2 Employment After Exit						
Contracted training (10%)	101	77.2%	85.2%	78	86	+8 pp / +8 individuals
ITA / other (90%)	906	77.2%	77.2% (held)	699	699	No change
Blended overall	**1,007**	**77.2%**	**77.9%**	**777**	**785**	**+0.8 pp**
Q4 Employment After Exit						
Contracted training (10%)	112	79.6%	84.6%	89	95	+5 pp / +6 individuals
ITA / other (90%)	1,009	79.6%	79.6% (held)	803	803	No change
Blended overall	**1,121**	**79.6%**	**80.1%**	**892**	**898**	**+0.5 pp**

Note: Baseline rates shown are rounded to one decimal place. Exact PY2024 baselines: Q2 = 77.16% (777/1,007); Q4 = 79.57% (892/1,121). Contracted cohort projections are additive percentage point increases applied to the baseline rate for that cohort only.

Outcome 4 Reduced Training-to-Employment Mismatch: Training-Related Employment
Training-related employment measures the share of Q2-employed trained participants whose post-exit employment is in an occupation directly related to their training program. This rate is expressed as a percentage of the Q2 employed numerator, consistent with Nevada's case management tracking methodology.

The PY2024 baseline training-related employment rate is 36.8 percent (286 of 777 Q2-employed trained participants). Because contracted training is by definition structured around specific employer job openings and validated workforce demand, Nevada projects that 75 percent of contracted training participants who achieve Q2 employment will be employed in a training-related occupation, compared to 36.8 percent for ITA-served participants.

Cohort	Q2 employed	Training-related rate	Training-related count	Change vs. baseline
Contracted training (10%)	86	75.0% (target)	65	+33 vs. baseline rate of 36.8%
ITA / other (90%)	699	36.8% (held constant)	257	No change
Blended overall	**785**	**41.0%**	**322**	**+4.2 pp / +36 individuals**

Baseline: 286 training-related employed / 777 Q2 employed = 36.8%. Denominator is Q2 employed numerator, not total exiters.

Measurement and Reporting Framework
Outcomes will be measured and reported as follows:

- Data source: UI wage records matched to exited participant records via Nevada's case management system and Unemployment Insurance database, consistent with WIOA common measures methodology.
- Cohort identification: Contracted training participants will be identified through a distinct service activity code in the case management system, enabling cohort-level reporting separate from ITA-served participants.

- Training-related employment: Tracked through case management SOC code matching at Q2, expressed as a percentage of Q2-employed trained participants.
- OJT tracking: OJT enrollments, completions, and employer contracts tracked through existing ETA-9169 reporting fields and local LWDB contract management systems.
- Apprenticeship tracking: Registered Apprenticeship and pre-apprenticeship enrollments tracked through ETA-9169 Title I participant activity records and reported in the WIOA Annual Report narrative.
- Reporting: All outcomes tracked and reported annually through the WIOA Annual Report and ETA-9169 performance submissions, with disaggregated reporting by program (Adult, Dislocated Worker, Youth), training type (contracted vs. ITA), and LWDB region, consistent with State Compliance Policy 5.7.

Waiver Outcome Statement
Nevada projects the following quantifiable outcomes for PY2026 and PY2027 under this waiver: (1) a minimum 20 percent increase in OJT enrollments over the PY2024 baseline (147 to 176 participants), with an OJT completion rate of at least 78 percent; (2) Registered Apprenticeship enrollment growth will be tracked and targeted established through the Local Workforce Development Board planning process; (3) a minimum 8 percentage point improvement in Q2 employment rates and 5 percentage point improvement in Q4 employment rates for participants served through training contracts (projected blended system-wide improvements of +0.8 pp Q2 and +0.5 pp Q4); and (4) a training-related employment rate of 75 percent for contracted training participants, yielding a projected blended improvement of +4.2 percentage points statewide (36.8 percent to 41.0 percent), representing an estimated 36 additional individuals employed in training-related occupations.

Waiver of WIOA Section 129(c)(2) that requires local areas to provide all 14 youth program elements

- Please provide quantifiable projected programmatic outcomes, specifically, please break out the expected performance outcomes as a result of this waiver.

Projected Programmatic Outcomes
Pursuant to the waiver authority described herein, Nevada projects the following quantifiable outcomes for Program Years 2026 and 2027. All projections are anchored to PY2024 statewide WIOA Youth program performance data and participant service activity records. This waiver will be implemented through a deliberately bounded pilot model applied to a limited cohort of out-of-school youth (OSY), with a streamlined service menu, ring-fenced budget allocation, and required work experience to protect the 20 percent OSY expenditure floor throughout the pilot period.

Pilot Design and Cohort Structure

Nevada will implement this waiver through small, locally driven pilots administered by each Local Workforce Development Board (LWDB). Rather than applying element flexibility across the entire youth program, the waiver is structured as a targeted service redesign for a defined population of disconnected OSY. This approach will limit compliance risks, contain budget exposure, and produces clean outcome data that can support a broader waiver request in a subsequent program year if results warrant expansion.

Population and Cohort Sizing

The PY2024 youth program served approximately 985 participants as measured by the Q2 employment denominator. Approximately 25 percent of participants are in-school youth (ISY), representing roughly 246 individuals. The remaining 75 percent, or approximately 739 participants, are out-of-school youth (OSY). The pilot cohort is defined as 10 percent of the OSY population, representing approximately 74 participants statewide, or 7.5 percent of total youth program enrollment.

Population Segment	Estimated Count	% of Total Program	Service Model
In-school youth (ISY)	246	25%	Standard — all 14 elements retained
OSY standard (90% of OSY)	665	67.5%	Standard — all 14 elements retained
OSY pilot cohort (10% of OSY)	74	7.5%	Streamlined pilot menu — see below
Total Youth Program	**985**	**100%**	**Pilot affects 7.5% of total enrollment**

The pilot cohort will be identified through the objective assessment and individual service strategy process at each LWDB. Eligibility is limited to OSY participants who are neither employed nor enrolled in education or training at program entry, have no pending secondary credential requirement, and whose labor market goals are best served by direct employer-connected work experience or occupational skills training. Each LWDB will submit a Local Youth Pilot Plan to DETR prior to implementation, identifying the target number of pilot participants, the service menu to be deployed, and the budget allocation for the pilot cohort.

Pilot Service Menu

Pilot cohort participants will receive a streamlined menu of six required elements and up to five locally discretionary elements, as described below. Every pilot participant must receive at least one required labor market attachment activity, either paid work experience or occupational skills training through an ITA or ETPL-approved provider, prior to exit.

Program Element	Pilot Status	Rationale
Objective assessment and individual service strategy	Required	Non-negotiable intake elements; drive all subsequent service planning and participant goal-setting
Paid work experience or OJT	Required	Primary labor market attachment activity; protects the 20% OSY work experience expenditure floor within the pilot budget
Occupational skills training (ITA or ETPL-approved provider)	Required	Core flexibility this waiver enables; must be offered and available to all pilot participants whose labor market goals align with training pathways
Financial literacy	Required	High current utilization (202 participants in PY2024); critical economic stability support for disconnected OSY transitioning to employment
Follow-up services	Required	Directly supports Q4 employment retention outcomes; protects program performance metrics during the post-exit period
Supportive services (transportation, housing, incentives)	Required	Transportation support served 1,453 participants in PY2024 — the single highest utilization service in the program; essential barrier removal for disconnected OSY
Comprehensive guidance and counseling	Locally discretionary	Retain where LWDB determines participant case complexity warrants individual counseling beyond standard service planning
Leadership development, tutoring, postsecondary transition	Locally discretionary	Retain where local employer partnerships or educational transition strategies support these activities for the pilot population

Program Element	Pilot Status	Rationale
Alternative secondary school, GED preparation, ESL	Locally discretionary	Retain only where pilot participant has an active secondary credential goal; do not apply to participants whose goals are direct employment or occupational training
Entrepreneurial training, job shadowing, mentoring	Locally discretionary	Offer only where local employer partnerships specifically support these activities for the pilot cohort

Projected Performance Outcomes
Performance outcomes are projected at two levels: the pilot cohort level (74 participants, 7.5 percent of total enrollment) and the blended system-wide level (all 985 participants). Because the pilot represents a small share of total enrollment, blended system-wide improvements are intentionally modest. The primary outcome of interest for evaluating waiver effectiveness is the rate-level improvement within the pilot cohort, which reflects the impact of the streamlined service model on the specific population served.

Cohort-Level Performance Baseline and Projections
PY2024 performance data for the pilot cohort is derived by applying the pilot's 7.5 percent share of total enrollment to statewide youth performance numerators and denominators. The standard cohort (ISY and non-pilot OSY) is held at PY2024 baseline rates; no improvement is projected for participants served under the existing 14-element model.

Measure	Cohort	PY2024 baseline	Projected PY2026–27	Projected Count	Change
Q2 Employment / Education / Training Rate After Exit					
Q2 rate	Pilot	71.6% (53/74)	75.7%	56 / 74	+4.0 pp / +3 youth
Q2 rate	Standard	71.3% (649/911)	71.3% (held)	649 / 911	No change
Blended Q2 Overall	**—**	**71.3% (702/985)**	**71.6% (705/985)**	**705 / 985**	**+0.3 pp / +3 youth**
Q4 Employment / Education / Training Rate After Exit					

Measure	Cohort	PY2024 baseline	Projected PY2026–27	Projected Count	Change
Q4 rate	Pilot	70.6% (60/85)	74.7%	63 / 85	+4.0 pp / +3 youth
Q4 rate	Standard	70.7% (737/1,042)	70.7% (held)	737 / 1,042	No change
Blended Q4 Overall	**—**	**70.7% (797/1,127)**	**71.0% (800/1,127)**	**800 / 1,127**	**+0.3 pp / +3 youth**
Median Earnings at Q2 After Exit					
Median earnings	Pilot	$5,857	$6,267	—	+7.0% / +$410
Median earnings	Standard	$5,857	$5,857 (held)	—	No change
Note: Median earnings improvement for the pilot cohort reflects the expected wage premium from employer-connected OJT and ITA-funded ETPL training placements relative to general job search assistance. Blended system-wide median earnings are not projected to change materially given the 7.5% pilot share.					

Credential Attainment

The credential attainment rate for the pilot cohort is projected to be maintained at or above the PY2024 baseline of 53.5 percent (23 of 43 pilot-share participants). Credential attainment is not projected to improve as a result of this waiver, as the pilot is focused on work-based learning and occupational training rather than secondary credential completion. However, participants who complete ITA or ETPL-approved occupational training programs leading to industry-recognized credentials will be counted in the credential attainment numerator, providing a pathway to credential attainment through the training track rather than the educational track.

DETR will track and report credential attainment separately for pilot cohort and standard cohort participants to ensure that any shift in the composition of the credential denominator resulting from the pilot is transparent and does not suppress the aggregate statewide rate. If the aggregate credential attainment rate falls below 53.2 percent in either PY2026 or PY2027, DETR will conduct a root cause analysis and report findings to USDOL ETA within 60 days.

Measurement and Reporting Framework

Outcomes will be measured and reported as follows:

- Annual evaluation: DETR will conduct an annual evaluation of pilot cohort outcomes at the close of each program year, comparing pilot cohort Q2 rate, Q4 rate, median earnings, and credential attainment against both the PY2024 baseline and the concurrent standard cohort. Findings will be reported in Nevada's WIOA Annual Report narrative and provided to USDOL ETA with the annual performance submission.

Waiver Outcome Statement

Nevada projects the following quantifiable outcomes for PY2026 and PY2027 under this waiver. The pilot cohort of approximately 74 out-of-school youth (10 percent of OSY, 7.5 percent of total youth enrollment) will be served under a streamlined six-element required menu with locally discretionary supplemental elements. Within the pilot cohort, Nevada projects a minimum Q2 employment / education / training rate of 75.7 percent, representing a +4.0-percentage point improvement over the PY2024 baseline of 71.6 percent and 3 additional youth achieving a positive Q2 outcome. Nevada projects a minimum Q4 employment/education/training rate of 74.7 percent for the pilot cohort, representing a +4.0-percentage point improvement over the PY2024 baseline of 70.6 percent and 3 additional youth achieving a positive Q4 outcome. Median earnings at Q2 for pilot cohort participants are projected at $6,267, a 7.0 percent improvement over the PY2024 baseline of $5,857, reflecting the wage premium associated with employer-connected OJT and ITA-funded occupational training placements. Credential attainment will be maintained at or above the PY2024 baseline of 53.5 percent for the pilot cohort. Blended statewide Q2 and Q4 rates are projected to improve by 0.3 percentage points relative to baseline, reflecting the pilot's 7.5 percent share of total enrollment. The 20 percent OSY work experience expenditure floor will be protected through a ring-fenced pilot budget with a required 25 percent WE expenditure target and quarterly LWDB reporting to DETR.