

U.S. Department of Labor

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



July 27, 2026

The Honorable Mike DeWine
Governor of Ohio
Riffe Center, 30th Floor
77 South High Street
Columbus, OH 43215

Dear Governor DeWine:

Thank you for your waiver request submission to the U.S. Department of Labor (Department) regarding certain statutory and regulatory provisions of the Workforce Innovation and Opportunity Act (WIOA) and the accompanying plan to improve the statewide workforce development system (enclosed). The waiver requests were received on April 29, 2026, as part of your recent WIOA State Plan modification submission. This letter provides the Employment and Training Administration's (ETA) official response to your request and memorializes that Ohio will meet the outcomes and implement the measures identified in its plan to ensure accountability agreed to by Ohio 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 WIOA Section 129(a)(4) and 20 CFR 681.410 which require that local workforce development areas expend at least 75 percent of local area youth funds to provide services to out-of-school youth (OSY) and calculation of the local area expenditure for each local area.

ETA Response: ETA approves for Program Years (PYs) 2026 and 2027, which includes the entire time period for which states are authorized to spend each of those 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 use both WIOA and Temporary Assistance for Needy Families (TANF) funds to count towards the 75 percent expenditure requirement. ETA reviewed Ohio'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. As a result of this waiver, ETA expects that the number of in-school youth (ISY) served will increase, and performance accountability outcomes for overall WIOA Youth (including both ISY and OSY) will remain steady or increase for the majority of the WIOA Youth performance indicators.

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

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

Requested Waiver: Waiver of WIOA Section 129(c)(4) and 20 CFR 681.590(b), to allow local workforce development areas to count both WIOA local youth formula funds and TANF funds toward the minimum 20 percent expenditure requirement for paid or unpaid work experience.

ETA Response: ETA approves for PYs 2026 and 2027, which includes the entire time period for which locals are authorized to spend each of those fund allotments, the State's request to allow local areas in the State to count both WIOA Youth and TANF expenditures toward the 20 percent expenditure requirement for paid or unpaid work experience for youth co-enrolled in those programs. ETA reviewed Ohio'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. In addition to WIOA local youth program funds spent on paid and unpaid work experiences, including wages and staff costs for development and management of work experiences, local areas in Ohio may include TANF work experience expenditures in the calculation of the 20 percent work experience expenditure requirement.

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

ETA Response: ETA approves, for PYs 2026 and 2027, the State's request to waive the requirement that local youth programs make available each of the 14 youth program elements listed in WIOA Section 129(c)(2) and 20 CFR 681.460. Under this approval, local areas are not required to make available all 14 program elements. ETA reviewed Ohio'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.

Ohio also requested to use work-flex, to which ETA is responding under separate cover.

The State is reminded that WIOA Title I waivers may not be used for any discriminatory purposes. All activities and waiver plan provisions must comply with Section 188 of WIOA, the implementing regulations at 29 CFR Part 38, and all applicable federal nondiscrimination laws.

The State must report its waiver outcomes and implementation of the approved waivers in the WIOA Annual Report. ETA will use this information to assess continued waiver approval and to identify promising practices that may be adopted more widely. ETA is available to provide technical assistance to you in support of your goals. If you have questions, feel free to contact my office at (202) 693-2772.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Marek Laco', with a stylized, flowing script.

Marek Laco
Acting Assistant Secretary

Enclosures

cc: Matt Damschroder, Director, Ohio Department of Job and Family Services
Pam Gerassimides, ETA Regional Administrator
Julie Baker, ETA Federal Project Officer

U.S. Department of Labor

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July 27, 2026

The Honorable Mike DeWine
Governor of Ohio
Riffe Center, 30th Floor
77 South High Street
Columbus, Ohio 43215

Dear Governor DeWine:

Thank you for your Workforce Innovation and Opportunity Act (WIOA) Workforce Flexibility (Workflex) Plan submitted under WIOA Section 190 and 20 CFR 679.630 to the U.S. Department of Labor (Department). The Workflex Plan was received on April 29, 2026, as part of your recent WIOA State Plan modification submission. We appreciate the State's leadership in pursuing the first Workflex designation under WIOA and for developing a plan that reflects Ohio's commitment to improved service delivery, innovation, and accountability. The Department approves, through June 30, 2028, Ohio's Workflex Plan, with the opportunity to extend approval, upon the State's request, when submitting its full four-year state plan in 2028. This agreement memorializes that the State will:

1. Establish a formal statewide mechanism for local waiver submissions and approvals before the Workflex designation becomes fully effective. Ohio must implement a formal, statewide process, consistent with 20 CFR 679.630(b)(1), through which local workforce development boards, in concurrence with chief elected officials, may submit waiver requests for State review and approval.

The mechanism must include, at minimum:

- A standardized waiver submission template;
- Defined timelines for State review;
- Written State determinations granting, conditionally granting, or denying each local request for the waivers outlined in the plan; and
- Procedures ensuring fiscal, programmatic, and internal control integrity.

The Department requests any written policies or local guidance, once this mechanism is finalized and operational.

2. Provide quarterly reporting including agreed-upon milestones consistent with the Workforce Innovation and Opportunity Act: Workforce Flexibility (Workflex) Plan Collection Form: Workflex Quarterly Report Requirements (OMB No. 1205-0432) and 20 CFR 679.640(b), which must include:
 - Waiver (assigned by State)

- Regulation/Statute affected
- Date received
- Date granted
- Local area(s) requesting waiver
- Purpose and goals of each waiver, proposed outcomes, and outcomes to date
- State-imposed conditions of waiver use, as appropriate

The Department will work with the State to finalize and document required milestones for inclusion in the quarterly report, beginning with the first quarterly report following this conditional approval.

3. Integrate Workflex Status and Outcomes in the State's Annual WIOA Report. Ohio must integrate Workflex-related activities, outcomes, and impacts into its annual WIOA narrative report, including:

- A summary of all waivers approved at the local level under Workflex authority;
- Outcome and performance data associated with the waivers; and
- Any effects on negotiated performance levels or service strategies.

This information must be reported in the first annual report following Workflex approval and in each annual report thereafter for the duration of the designation.

Duration of Approval and Expectations

Once the State finalizes its Workflex policies and procedures, Ohio's Workflex designation will become fully effective through June 30, 2028, the remainder of the current State Plan period, consistent with 20 CFR 679.630(d). The Employment and Training Administration (ETA) Regional Office staff will follow up with the State to confirm timelines, establish milestone expectations, and support quarterly and annual reporting implementation.

With this approval of Workflex authority, the Department memorializes the expectation that all approvals of local waivers granted by the State strictly adhere to the parameters established under WIOA Section 190 and its implementing regulations. Any local waiver approval that exceeds the scope of Workflex authority, or that results in discriminatory, unlawful, or otherwise impermissible implementation fundamentally undermines the integrity of the Workflex plan. See Section 188 of WIOA, the implementing regulations at 29 CFR Part 38, and all applicable federal nondiscrimination laws. The Department will closely review such actions, and if it is determined that the State has acted outside its statutory or regulatory authority, the Department may take appropriate corrective steps, up to and including revocation of the individual local waiver or termination of the State's Workflex authority, as permitted under 20 CFR 679.640(b). If the State has any questions about whether approval of a local waiver might exceed the scope of Workflex authority, we encourage the State to reach out to its ETA Regional Office before approving the waiver.

The Department appreciates Ohio's willingness to innovate and its commitment to improving services for workers, job seekers, and employers. We look forward to continued collaboration as the State implements its Workflex authority. ETA is available to provide technical assistance to you in support of your goals. If you have questions, feel free to contact my office at (202) 693-2772.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Marek Laco', with a stylized flourish at the end.

Marek Laco
Acting Assistant Secretary

Enclosures

cc: Matt Damschroder, Director, Ohio Department of Job and Family Services
Pam Gerassimides, ETA Chicago Regional Administrator
Julie Baker, ETA Federal Project Officer

OHIO ALL WAIVERS

Waiver 1: Allow TANF funds to count toward the 75% expenditure requirement on out-of-school youth and to calculate the expenditure requirement on a statewide basis.

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

Section 129(a)(4) of WIOA and 20 CFR 681.41 require local workforce development areas to expend a minimum of 75% of WIOA youth funds on Out-of-School Youth (OSY). Ohio is requesting a waiver for PY26 and PY27 (July 1, 2026 – June 30, 2028) to:

- Allow a percentage of Temporary Assistance for Needy Families (TANF) funds to count toward the 75% OSY expenditure requirement; and
- Calculate this expenditure requirement on a statewide basis rather than by individual local workforce development areas.

Goals and Alignment with the Combined State Plan

The waiver supports Ohio's Comprehensive Case Management and Employment Program (CCMEP) by integrating WIOA and TANF funding streams to deliver more cost-effective, scalable services for disconnected youth. This co-funding approach expands service capacity, particularly through TANF investment, enabling WIOA Youth funds to be leveraged for greater reach and impact. Calculating the OSY expenditure rate at the statewide level promotes flexibility and responsiveness to local needs while maintaining compliance with federal requirements.

This strategy aligns with Ohio's workforce priorities and the Combined State Plan by:

- Streamlining services and reducing administrative burden associated with managing separate federal funding streams;
- Increasing accountability and accessibility through integrated service delivery;
- Promoting state and local flexibility to tailor services to unique youth populations;
- Supporting CCMEP implementation by using both WIOA and TANF resources to meet the diverse needs of the same customer; and
- Maintaining LWDB authority to determine funding allocations for in-school and out-of-school youth programs.

By including TANF expenditures in both the numerator and denominator of the OSY expenditure calculation a methodology first implemented in PY2020, Ohio ensures accurate representation of co-funded services and maximizes the impact of available resources. This waiver reflects federal priorities for flexibility, innovation, and accountability in workforce development and advances Ohio's goal of expanding access to high-quality youth services while promoting fiscal efficiency and measurable outcomes.

2. Describe the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;

There are no State or local statutory or regulatory barriers to implementing the proposed waiver.

3. Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;

Goals of the Waiver

- Increase the number of WIOA-funded youth participants by expanding financial flexibility.
- Enhance continuity and efficiency in service delivery through integrated funding streams.
- Provide flexibility in determining funding sources for CCMEP participants eligible for both WIOA and TANF.
- Increase enrollment among harder-to-serve youth populations, ensuring equitable access to services.
- Promote co-enrollment in WIOA and TANF, enabling youth to access a full range of services and resources.
- Reduce administrative costs, allowing more funds to be directed toward participant services.
- Improve employment and training outcomes, increasing the percentage of youth who obtain and maintain employment or enroll in training programs.
- Integrate WIOA and TANF services to create a seamless experience for participants.
- Drive improved performance outcomes, including higher rates of credential attainment, employment, and training completion.

Expected Programmatic Outcomes

If granted, the waiver will:

- Support individualized service delivery that addresses multiple barriers to employment and training.
- Increase co-enrollment rates, ensuring comprehensive support for youth.
- Enable greater flexibility in resource allocation, reducing duplication and administrative burden.
- Drive improved performance outcomes, including higher rates of credential attainment, employment, and training completion.

By aligning TANF and WIOA resources under CCMEP, Ohio will create a more efficient, participant-centered system that maximizes impact and meets the needs of youth across the state.

4. Describe how the waiver will align with the Department's policy priorities, such as:
 - supporting employer engagement;
 - connecting education and training strategies;
 - supporting work-based learning;
 - improving job and career results, and
 - other guidance issued by the Department

Ohio's waiver request to allow TANF funds to count toward the 75% Out-of-School Youth (OSY) expenditure requirement and to calculate this requirement on a statewide basis directly supports the U.S. Department of Labor's policy priorities, including employer engagement, connecting education and training strategies, supporting work-based learning, and improving job and career outcomes.

Alignment with Policy Priorities:

- **Employer Engagement and Career Results:** By expanding co-enrollment and leveraging TANF resources, the waiver enables CCMEP to serve more youth and provide access to career counseling, job placement, and work-based learning opportunities. This approach strengthens connections between employers and job seekers, improving employment outcomes and job retention.
- **Education and Training Strategies:** The waiver supports Ohio's commitment to investing in education and training for jobs that empower individuals with 21st-

century skills, aligning with the Combined State Plan's goal of promoting education and training for in-demand occupations.

- **Work-Based Learning:** Increased flexibility in funding allows local areas to prioritize work-based learning experiences, such as internships and on-the-job training, ensuring youth gain practical skills and credentials valued by employers.
- **Improved Job and Career Outcomes:** By reducing administrative burden and streamlining services, the waiver ensures more resources are directed toward individualized, holistic support, addressing barriers such as transportation, childcare, and housing, leading to better long-term employment and career success.

Connection to Ohio's Strategic Goals

The waiver advances the four strategic goals outlined in Ohio's 2024 Combined State Plan:

1. Coordinate efforts across entities to reduce duplication and maximize resources through integrated WIOA and TANF funding.
2. Leverage technology and data to improve service delivery and track outcomes for co-enrolled participants.
3. Deploy locally driven programs that reflect regional needs while maintaining statewide compliance.
4. Invest in education and training for high-demand jobs, ensuring Ohio's workforce supports economic growth and community well-being.

Flexibility for Diverse Populations

Ohio's youth population varies significantly across regions. Urban areas often have high-density populations and greater resources, while rural and Appalachian regions face lower population density and limited resources. Calculating the OSY expenditure requirement on a statewide basis provides the flexibility needed to allocate resources equitably, ensuring that Local Workforce Development Boards (LWDBs) can focus on populations with the greatest need. This approach reflects demographic realities and supports Ohio's commitment to serving all youth effectively, regardless of geography.

Impact on CCMEP and Service Delivery

CCMEP's person-centered approach addresses multiple barriers to employment and provides access to the full array of WIOA youth program elements. The waiver enhances this model by allowing co-funding flexibility, extending WIOA resources, and enabling

statewide calculation of OSY expenditures. Local Workforce Development Boards retain authority to determine funding allocations for in-school and out-of-school youth, preserving local control while promoting efficiency and accountability.

Conclusion

This waiver reflects federal priorities for flexibility, innovation, and accountability and supports Ohio's vision of a coordinated, technology-driven, locally responsive workforce system that prepares youth for sustainable careers and strengthens Ohio's economic competitiveness.

5. Describe the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment

The waiver will primarily impact youth and young adults served under Ohio's Comprehensive Case Management and Employment Program (CCMEP), which includes TANF work-eligible recipients and WIOA in-school and out-of-school youth ages 14 to 24. By virtue of program eligibility requirements, CCMEP directly targets disadvantaged populations and individuals with multiple barriers to employment, such as poverty, limited education, housing instability, and lack of transportation or childcare.

Impact of the Waiver on Service Delivery

- **Expanded Funding Flexibility:** Allowing TANF funds to count toward the 75% OSY expenditure requirement enables local areas to allocate resources more effectively and efficiently, ensuring that both TANF and WIOA funds are leveraged to meet participant needs.
- **Statewide Calculation for Equity:** Calculating the OSY expenditure rate on a statewide basis provides flexibility for local workforce areas to focus on populations with the greatest need. This approach is particularly critical given Ohio's demographic diversity—urban areas often have high-density youth populations and more resources, while rural and Appalachian regions face lower population density and limited resources.
- **Enhanced Access for Hard-to-Serve Populations:** The waiver supports equitable service delivery by allowing local areas to prioritize disadvantaged youth and young adults who can benefit most from CCMEP's holistic, person-centered approach, including access to supportive services, education, training, and employment opportunities.

Conclusion

This waiver strengthens Ohio's ability to serve individuals with multiple barriers to employment by promoting flexibility, reducing administrative burden, and ensuring resources are directed where they are most needed. It advances the state's commitment to equity, efficiency, and improved outcomes for disadvantaged populations.

6. Describes the processes used to:

- Monitor the progress in implementing the waiver;
- Provide notice to any local board affected by the waiver;
- Provide any local board affected by the waiver an opportunity to comment on the request;
- Ensure meaningful public comment, including comment by business and organized labor, on the waiver.
- Collect and report information about waiver outcomes in the State's WIOA Annual Report.

Monitoring Implementation and Impact

The Ohio Department of Job and Family Services (ODJFS) will monitor the waiver's implementation and outcomes through a combination of local reporting via the Advancement of Resources through Information and Employment Services (ARIES) system, state-level oversight, and evaluation activities. Monitoring will include routine desk reviews, on-site compliance visits, fiscal data analysis, and feedback from local workforce development areas. Regular meetings between ODJFS staff and local board directors will provide a forum to address implementation issues and ensure continuous improvement.

ODJFS also incorporates innovative evaluation strategies, such as the USDOL Behavioral Insights study, which tested text message interventions to improve CCMEP participant engagement. Findings demonstrated that sustained messaging increased service use and completion rates, confirming that low-cost automation can enhance program outcomes when thoughtfully designed.

Notification and Opportunity for Comment

Local Workforce Development Boards (LWDBs), businesses, organized labor, and other stakeholders were notified of the proposed waiver through email alerts with instructions for submitting comments. The waiver request was also posted on the Ohio Workforce Development (OWD) website, ensuring broad public access and opportunity for meaningful input.

Public Comment and Stakeholder Engagement

ODJFS ensured meaningful public comment by providing open access to the waiver request and actively soliciting feedback from workforce stakeholders, including employers and labor organizations. This process aligns with transparency and accountability principles outlined in federal guidance.

Reporting Waiver Outcomes

ODJFS will report waiver outcomes annually in the State's WIOA Annual Report, including recalculation of the statewide OSY expenditure rate to reflect TANF funds spent on co-enrolled OSY participants. This reporting will demonstrate the waiver's impact on service delivery, resource allocation, and participant outcomes.

Conclusion

Through robust monitoring, transparent stakeholder engagement, and comprehensive reporting, Ohio ensures that the waiver is implemented effectively, supports continuous improvement, and aligns with federal priorities for flexibility, innovation, and accountability.

7. Provide the most recent data available regarding the results and outcomes observed through implementation of the existing waiver, in cases where the State seeks renewal of a previously approved waiver.

Ohio seeks renewal of the previously approved waiver allowing TANF funds to count toward the 75% Out-of-School Youth (OSY) expenditure requirement and calculating this requirement on a statewide basis. The most recent data demonstrates that the waiver has supported strong compliance and effective resource utilization:

- Program Year (PY) 2021: 86.10%
- Program Year (PY) 2022: 86.07%
- Program Year (PY) 2023: 88.90%

These results significantly exceed the federal minimum requirement of 75%, confirming that the waiver has enabled Ohio to maintain high OSY investment levels while promoting flexibility and efficiency in service delivery. The upward trend reflects Ohio's commitment to serving disconnected youth and leveraging TANF and WIOA resources to maximize impact.

Waiver 2: Allow the use of individual training accounts (ITA) for in-school youth, ages 18- 21 years.

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

Statutory Requirement Under 20 CFR 681.550, Individual Training Accounts (ITAs) funded by WIOA youth funds may only be used by Out-of-School Youth (OSY). In-school youth (ISY) can access ITAs only through co-enrollment in the WIOA Adult program. Ohio seeks a waiver to expand ITA eligibility to in-school youth, eliminating the need for co-enrollment. Ohio is requesting a waiver for PY26 and PY27 (July 1, 2026 – June 30, 2028)

Goals and Alignment with the Combined State Plan

The waiver aims to:

- Expand training options and career pathways for in-school youth, encouraging early engagement with in-demand occupations.
- Increase program flexibility and customer choice, empowering youth to make informed decisions and take ownership of their career development.
- Reduce administrative burden by allowing ITAs to be issued from a single funding source, improving efficiency and accountability.

This waiver aligns with Ohio's Combined State Plan goals by:

- Investing in education and training for jobs that provide 21st-century skills.
- Coordinating efforts across systems to reduce duplication and maximize resources.
- Deploying locally driven programs that produce measurable results.

Conclusion

Expanding ITA access to in-school youth supports Ohio's vision of a streamlined, flexible workforce system that prepares youth for high-demand careers while promoting equity and efficiency.

2. Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;

There are no State or local statutory or regulatory barriers to implementing the proposed waiver.

3. Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;

Ohio expects to achieve the following goals and programmatic outcomes:

- Improve the ability of LWDBs, youth program providers, and CCMEP lead agencies to respond quickly to the needs of in-school youth;
 - Increase the quality of learning opportunities;
 - Increase employment and training opportunities;
 - Improve coordination by reducing fragmentation of service delivery;
 - Improve customer choice and increase empowerment for youth, making them capable and responsible for making thoughtful choices about their career;
 - Reduce unnecessary paperwork;
 - Develop the emerging workforce with prepared candidates ready for work; and
 - Increase accountability.
4. Describe how the waiver will align with the Department's policy priorities, such as:
- supporting employer engagement;
 - connecting education and training strategies;
 - supporting work-based learning;
 - improving job and career results, and
 - other guidance issued by the Department

Ohio's request to allow in-school youth (ISY) to access Individual Training Accounts (ITAs) aligns directly with the U.S. Department of Labor's policy priorities by expanding training opportunities and promoting career readiness.

Supporting Employer Engagement and Career Results

By enabling ISY to earn industry-recognized credentials, the waiver prepares an emerging workforce with skills employers' demand, improving job placement and long-term career outcomes.

Connecting Education and Training Strategies

This waiver integrates education with career pathways by allowing ISY to pursue training for in-demand occupations while completing high school. It also provides an alternative for students whose standardized test scores do not meet graduation requirements, ensuring they can graduate and transition into the workforce.

Supporting Work-Based Learning

Access to ITAs creates opportunities for ISY to participate in training programs that include work-based learning components, strengthening connections between classroom learning and real-world experience.

Increasing Flexibility and Customer Choice

Expanding ITA eligibility promotes program flexibility, reduces administrative burden, and empowers youth to make informed decisions about their career paths, consistent with WIOA's intent to enhance customer choice.

Conclusion

This waiver supports Ohio's Combined State Plan goals by investing in education and training for high-demand jobs, reducing duplication, and deploying locally driven programs that produce measurable results. It ensures that Ohio's youth are equipped with 21st-century skills and ready to meet employer needs.

5. Describe the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment

This waiver will benefit WIOA in-school youth (ISY) served under Ohio's Comprehensive Case Management and Employment Program (CCMEP), which also includes TANF work-eligible recipients and out-of-school youth ages 14–24. By design, CCMEP targets disadvantaged populations and individuals with multiple barriers to employment, such as poverty, limited education, and lack of access to transportation or childcare.

Impact of the Waiver

- **Expanded Training Access:** Allowing ISY to use Individual Training Accounts (ITAs) provides greater access to education and training for in-demand occupations.
- **Support for At-Risk Youth:** The waiver offers an alternative pathway to high school graduation by enabling students to earn industry-recognized credentials when standardized test scores fall short.
- **Empowerment and Career Readiness:** By increasing training and employment opportunities, the waiver encourages ISY to explore career pathways, make informed decisions, and take ownership of their future.

Conclusion

This waiver strengthens Ohio's ability to serve disadvantaged youth and those with multiple barriers by expanding options, promoting equity, and preparing an emerging workforce for sustainable careers.

6. Describes the processes used to:

- Monitor the progress in implementing the waiver;
- Provide notice to any local board affected by the waiver;
- Provide any local board affected by the waiver an opportunity to comment on the request;
- Ensure meaningful public comment, including comment by business and organized labor, on the waiver.
- Collect and report information about waiver outcomes in the State's WIOA Annual Report.

Monitoring Implementation

ODJFS will monitor waiver implementation and impact through local reporting in the ARIES system, state-level oversight, and evaluation activities. Monitoring will include desk reviews, on-site compliance visits, fiscal data analysis, and feedback from local workforce development areas. Regular meetings with local board directors will provide a forum to address issues and ensure continuous improvement.

Notification and Opportunity for Comment

Local Workforce Development Boards (LWDBs) were notified of the proposed waiver via email alerts, which included instructions for submitting comments. These communications ensured LWDBs had both notice and opportunity to provide input. Waiver request was posted on OWD website.

Public Comment and Stakeholder Engagement

ODJFS ensured meaningful public comment by posting the waiver request on the Ohio Workforce Development (OWD) website and notifying stakeholders, including businesses and organized labor, through targeted outreach. This process promoted transparency and broad stakeholder engagement. Waiver request was posted on OWD website.

Reporting Waiver Outcomes

ODJFS will report waiver outcomes annually in the State's WIOA Annual Report, including data on ITA usage by in-school youth and analysis of the waiver's impact on training access and career outcomes.

7. Provide the most recent data available regarding the results and outcomes observed through implementation of the existing waiver, in cases where the State seeks renewal of a previously approved waiver.
- Program Year (PY) 2023: 342

- Program Year (PY) 2024: 423

Waiver 3: Allow TANF funds to count towards the 20% work experience expenditure requirement.

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

Ohio seeks a waiver from 20 CFR 681.590(b), which requires local workforce development areas to expend at least 20% of WIOA youth funds on paid and unpaid work experiences, calculated solely on WIOA youth program funds.

Waiver Request and Goals

Ohio seeks to include TANF-funded work experience wages in the calculation of the 20% work experience expenditure requirement. This would allow TANF expenditures for co-enrolled youth to be added to both the numerator and denominator of the calculation, alongside WIOA youth wages and related staff costs. Ohio is requesting a waiver for PY26 and PY27 (July 1, 2026 – June 30, 2028)

Example: WIOA paid youth wages for work experience + WIOA staff costs for development and maintenance of work experiences + TANF paid youth wages for co-enrolled work experience = Total Work Experience Calculation.

Goals and Alignment with the Combined State Plan

- **Expand Work Experience Opportunities:** By leveraging TANF resources, local areas can develop more paid and unpaid work experiences without being limited to WIOA youth funds.
- **Increase Enrollment and Access:** The waiver will enable more youth, particularly co-enrolled TANF and WIOA participants, to participate in work experiences that build skills and improve employability.
- **Streamline Services and Reduce Administrative Burden:** Combining funding sources supports efficiency, accountability, and flexibility for local boards.
- **Support Strategic Workforce Goals:** This waiver aligns with Ohio's Combined State Plan by promoting education and training for in-demand jobs, reducing duplication, and deploying locally driven programs that produce measurable results.

Conclusion

Approval of this waiver will strengthen Ohio's ability to provide high-quality work

experiences, improve outcomes for disadvantaged youth, and maximize the impact of TANF and WIOA resources.

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

There are no State or local statutory or regulatory barriers to implementing the proposed waiver.

3. Describe the goals of the waiver and the expected programmatic outcomes if the request is granted.

The goal of this waiver is to increase access to high-quality work experiences for youth by allowing TANF-funded wages for co-enrolled participants to count toward the 20% work experience expenditure requirement. This flexibility will enable local areas to leverage multiple funding streams, expand opportunities, and reduce administrative barriers.

Expected Programmatic Outcomes

- Increase in Work Experience Investment: Ohio anticipates that approval of this waiver will raise the statewide work experience percentage beyond the 20% minimum, with growth in every local area.
- Expanded Participation: Historical data shows strong engagement in work experiences, PY23 enrolled 7,081 youth and PY24 enrolled 19,657 youth. With this waiver, Ohio projects a 5% increase in the rate of youth enrolled in work experience services over the next two program years.
- Improved Career Readiness: More youth will gain hands-on experience, industry exposure, and skills aligned with employer needs, leading to better employment outcomes and long-term career success.

Conclusion

This waiver supports Ohio's Combined State Plan goals by promoting education and training for in-demand jobs, streamlining service delivery, and deploying locally driven programs that produce measurable results.

4. Describe how the waiver will align with the Department's policy priorities, such as:
 - supporting employer engagement;
 - connecting education and training strategies;
 - supporting work-based learning;

- improving job and career results, and
- other guidance issued by the Department

Approval of this waiver aligns with the U.S. Department of Labor’s policy priorities and America’s Talent Strategy by expanding access to work-based learning and preparing youth for the jobs of the future.

Supporting Employer Engagement and Career Results

By increasing the number of paid work experiences through combined WIOA and TANF resources, employers gain access to a pipeline of skilled youth ready for in-demand jobs. This strengthens partnerships between workforce programs and businesses, improving job placement and long-term career outcomes.

Connecting Education and Training Strategies

The waiver integrates education and work-based learning by providing youth with hands-on experience while reinforcing career pathways aligned with Ohio’s economic priorities. These experiences equip participants with 21st-century skills and industry-recognized credentials.

Supporting Work-Based Learning

Work-based learning is a proven strategy for improving employment outcomes, labor force participation, and wage growth. By allowing TANF funds to count toward the 20% requirement, Ohio can expand these opportunities statewide, ensuring more youth gain practical experience that leads to self-sufficiency.

Improving Job and Career Results

This waiver will increase access to paid work experiences, resulting in better employment outcomes, higher wages, and stronger connections to employers as youth transition into the unsubsidized labor force.

Alignment with Ohio’s Combined State Plan Goals

- Goal #1: Coordinate efforts across entities to reduce duplication and maximize resources through co-enrollment and shared funding.
- Goal #2: Leverage data and technology to track outcomes and improve services.
- Goal #3: Deploy locally driven programs that produce measurable results.
- Goal #4: Invest in education and training for jobs that strengthen Ohio’s economic advantage and workforce readiness.

Conclusion

This waiver directly supports federal priorities and Ohio's strategic vision by expanding work-based learning, fostering employer engagement, and preparing youth for sustainable careers in the modern economy.

5. Describe the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment.

Individuals Impacted

This waiver will directly benefit youth enrolled in the WIOA Youth program, including those co-enrolled in TANF under Ohio's Comprehensive Case Management and Employment Program (CCMEP). By design, CCMEP serves disadvantaged populations and individuals with multiple barriers to employment, such as poverty, limited education, and lack of access to transportation or childcare.

Impact on Services

- **Expanded Access for Youth with Barriers:** Approval of this waiver will allow local areas to fund work experiences using both WIOA and TANF resources, increasing opportunities for youth who face significant challenges to employment.
- **Support for At-Risk Youth:** Work experiences provide critical exposure to the workplace, helping youth build skills and confidence while earning wages.
- **Employer Benefits:** The most recent Ohio Labor Market Information (LMI) projections for short-term demand (and consistent with trends expected for 2026–2027) indicate that the occupations with the highest annual openings are concentrated in service, retail, and logistics roles, as well as healthcare support. Based on historical and projected patterns, examples of top occupations include:
 - Laborers and Freight, Stock, and Material Movers – High demand in warehousing and distribution sectors.
 - Stockers and Order Fillers – Driven by growth in retail and e-commerce.
 - Cashiers – Continued need in retail and food service establishments.
 - Retail Salespersons – Strong demand across Ohio's retail sector.
 - Home Health and Personal Care Aides – Reflecting growth in healthcare and aging population needs.
 - Fast Food and Counter Workers – Consistent openings in food service.

- Registered Nurses – High demand in healthcare facilities statewide.

These roles align with Ohio’s short-term employment outlook and are expected to remain among the top occupations with annual openings through 2026–2027, supporting entry-level employment opportunities and pathways to career advancement.

Conclusion

By leveraging TANF funds toward the 20% work experience requirement, Ohio will expand opportunities for disadvantaged youth, strengthen employer partnerships, and improve long-term employment outcomes.

6. Describes the processes used to:

- Monitor the progress in implementing the waiver;
- Provide notice to any local board affected by the waiver;
- Provide any local board affected by the waiver an opportunity to comment on the request;
- Ensure meaningful public comment, including comment by business and organized labor, on the waiver.
- Collect and report information about waiver outcomes in the State’s WIOA Annual Report.

Monitoring Implementation

ODJFS will monitor waiver implementation through monthly expenditure reporting in the ARIES system, requiring local areas to report WIOA youth work experience dollars and TANF-funded work experience wages as separate categories. These will be combined to calculate the overall work experience percentage. Annual on-site programmatic reviews will evaluate waiver utilization and ensure program goals are met.

Notification and Opportunity for Comment

All local workforce development boards will be notified upon waiver approval and provided formal reporting instructions. Prior to submission, local boards received email alerts with instructions for submitting comments, ensuring transparency and engagement.

Public Comment and Stakeholder Engagement

ODJFS ensured meaningful public comment by posting the waiver request on the Ohio Workforce Development (OWD) website and notifying stakeholders, including businesses and organized labor—via targeted outreach. This process aligns with federal guidance for stakeholder participation.

Reporting Outcomes

Waiver outcomes will be documented in the State's WIOA Annual Report, including recalculated work experience percentages that incorporate TANF-funded wages. This reporting will demonstrate the waiver's impact on expanding work-based learning and improving youth employment outcomes.

7. Provide the most recent data available regarding the results and outcomes observed through implementation of the existing waiver, in cases where the State seeks renewal of a previously approved waiver.

Ohio continues to demonstrate strong performance in implementing its existing waiver related to work experience requirements. Historically, the state has consistently exceeded the federal benchmark of 20% participation in work experience activities for youth programs.

Program Year (PY) 2023:

- Total Participants: 19,643
- Work Experience Enrollment: 36.0%

Program Year (PY) 2024:

- Total Participants: 19,657
- Work Experience Enrollment: 31.5%

These results confirm that Ohio's waiver has supported robust engagement in work experience opportunities, maintaining rates significantly above the required threshold. The waiver continues to provide flexibility that enhances program effectiveness and ensures youth gain valuable work-based learning experiences.

Waiver 4: Flexibility in the Provision of All 14 WIOA Youth Program Elements under CCMEP

1. The State of Ohio requests a waiver of the requirement under WIOA Section 129(c)(1) and 20 CFR 681.460 that mandates local workforce development areas provide access to all 14 WIOA youth program elements. This waiver would allow local areas to focus on delivering the most impactful services aligned with Ohio's workforce priorities and America's Talent Strategy.

Ohio's Comprehensive Case Management and Employment Program (CCMEP) integrates WIOA Youth and TANF funding to deliver a unified, person-centered approach to youth workforce development. Requiring all 14 program elements in every local area can limit

flexibility and dilute resources. This waiver would allow local areas to prioritize high-impact services that directly support youth employment and skill development.

Strategic Alignment with America's Talent Strategy:

This waiver supports the federal workforce vision outlined in America's Talent Strategy: Building the Workforce for the Golden Age, which emphasizes:

- Industry-driven strategies that align training with employer needs
- Work-based learning, including pre-apprenticeships and registered apprenticeships
- Expanded use of Individual Training Accounts (ITAs) for youth to access in-demand skills training and credentials
- Integrated service delivery across workforce, education, and human services systems.

Ohio will focus on these pillars by emphasizing work experience, career pathways, and credential attainment to prepare youth for high-demand, high-wage careers.

Monitoring and Implementation:

Local areas will continue to assess youth needs and ensure access to essential services through partnerships with community-based organizations, education providers, and human services agencies. The State will provide technical assistance and monitor implementation to ensure equitable access and alignment with WIOA performance indicators.

Expected Outcomes:

- Expanded access to work-based learning and credentialing opportunities for youth
- Increased enrollment in work-based learning programs (target: +15%)
- Greater utilization of Individual Training Accounts (ITAs) among youth (target: +20%)
- Improved credential attainment and job placement rates, supporting career pathways
- Enhanced employer engagement and stronger alignment with regional economic strategies
- Greater flexibility to tailor services to local workforce and industry needs
- Improved cost-efficiency and effectiveness in service delivery

- Stronger alignment with employer demand to advance skills-based hiring and talent pipelines

WIOA Workflex Plan

1. Process for Local Areas to Submit and Obtain State Approval of Waivers

The State of Ohio, through the Ohio Department of Job and Family Services (ODJFS), Office of Workforce Development (OWD), will establish a standardized process by which Local Workforce Development Boards (LWDBs), in concurrence with their Chief Elected Officials (CEOs), may submit applications requesting waivers of certain WIOA Title I statutory and regulatory requirements under Ohio's approved WorkFlex Plan.

Local waiver requests must be submitted in writing using a State-prescribed waiver request template and must include:

- Identification of the specific statutory or regulatory provision for which a waiver is requested;
- A description of the local workforce challenge or barrier the waiver is intended to address;
- A detailed explanation of how the waiver will improve service delivery to job seekers and employers;
- Proposed performance outcomes and measures; and
- A description of fiscal, programmatic, and internal controls to ensure accountability.

OWD will review all waiver requests and issue written determinations approving, conditionally approving, or denying requests. Approved waivers may be time-limited, subject to additional reporting requirements, or rescinded if compliance or performance concerns arise.

2. Criteria for State Approval of Local Waiver Requests

In evaluating local waiver requests under this WorkFlex Plan, Ohio will apply the following criteria:

- **Alignment with State Plan Goals:** The waiver must support the strategic goals outlined in Ohio's WIOA Combined State Plan, including industry-driven strategies, worker mobility, integrated systems, accountability, and innovation.

- **Programmatic Benefit:** The waiver must demonstrate a clear benefit to job seekers and/or employers, including improved access to training, faster service delivery, improved retention, or wage progression.
- **Performance Accountability:** The waiver must include measurable outcomes aligned with WIOA primary indicators of performance or clearly defined supplemental measures.
- **Protection of Statutory Requirements:** The waiver must not alter participant eligibility, nondiscrimination protections, labor standards, allocation formulas, or other non-waivable statutory provisions.
- **Fiscal Integrity:** The waiver must maintain appropriate fiscal controls, documentation standards, and compliance with Uniform Guidance requirements.

3. Statutory and Regulatory Requirements of WIOA Title I Likely to Be Waived

Under this WorkFlex Plan, Ohio anticipates requesting and approving local waivers in the following areas, subject to approval by the U.S. Department of Labor.

Waiver 1: Supportive Services During the Follow-Up Period

Ohio may approve local waivers of WIOA section 134(d)(2) (29 U.S.C. § 3174(d)(2)) and 20 CFR 680.910 to permit the provision of targeted supportive services to WIOA Adult and Dislocated Worker participants during the follow-up period after exit, when such participants are receiving follow-up services authorized under WIOA section 134(c)(2)(A)(xiii) and 20 CFR 680.150(c).

Supportive services provided under an approved waiver must be necessary to support employment retention or wage progression and may include transportation assistance, temporary living expenses, childcare, or other employment-related supports. All eligibility requirements, documentation standards, and fiscal controls applicable to supportive services will remain in effect.

Waiver 2: Use of Training Contracts in Lieu of Individual Training Accounts (ITAs)

Ohio may approve local waivers of WIOA section 134(c)(3)(G) (29 U.S.C. § 3174(c)(3)(G)) and 20 CFR 680.320 and 680.340 to expand the circumstances under which training services may be provided through training contracts rather than Individual Training Accounts (ITAs), when use of the ITA model is impractical or inefficient.

ITAs will remain the primary method for the delivery of training services. Local areas operating under an approved waiver must continue to ensure informed customer choice to the greatest extent practicable and prioritize employer-validated, industry-driven training aligned with in-demand occupations.

Waiver 3: Increased Use of Adult and Dislocated Worker Funds for Incumbent Worker Training

Ohio may approve local waivers of WIOA section 134(d)(4)(A)(i) (29 U.S.C. § 3174(d)(4)(A)(i)) and 20 CFR 680.800(a) to allow local workforce development areas to reserve and expend up to 35 percent of Adult and Dislocated Worker funds for the federal share of Incumbent Worker Training activities.

All statutory and regulatory requirements related to employer cost-sharing, worker protections, and fiscal accountability will continue to apply. This waiver is intended to support layoff aversion strategies and workforce upskilling aligned with regional labor market needs.

Waiver 4: Flexibility Related to the Requirement to Establish and Maintain a Comprehensive OhioMeansJobs Center in Each Local Area

Ohio may approve local waivers of WIOA section 121(e)(2)(A) (29 U.S.C. § 3151(e)(2)(A)) and 20 CFR 678.300(c) and 678.305 to allow a local workforce development area to meet physical access requirements through an alternative service delivery design that does not require maintaining a comprehensive physical OhioMeansJobs center within the local area. This authority does not eliminate Ohio's commitment to maintaining Comprehensive OhioMeansJobs Centers statewide but instead provides limited, case-by-case flexibility where an alternative model can demonstrate equal or improved access and service integration.

Under an approved waiver, local areas must continue to ensure customer access to required one-stop partner programs, services, and activities through an approved combination of affiliate OhioMeansJobs centers, partner access points, mobile OhioMeansJobs centers, and technology-enabled service delivery. Local areas must continue to meet OhioMeansJobs certification standards, maintain Memoranda of Understanding and cost-sharing agreements, and comply with all applicable performance, accessibility, reporting, and fiscal accountability requirements.

4. Wagner-Peyser Act Waivers

Ohio does not propose waivers of sections 8 through 10 of the Wagner-Peyser Act under this WorkFlex Plan.

5. Older Americans Act Waivers

Ohio does not propose waivers of the Older Americans Act under this WorkFlex Plan.

6. Expected Outcomes and Performance Measures

Ohio anticipates the following outcomes from implementation of the waivers approved under this WorkFlex Plan:

- Improved employment retention and reduced early job separations;
- Increased credential attainment and skills progression;
- Faster access to training aligned with employer demand;
- Increased use of work-based and employer-validated training models; and
- More efficient use of WIOA Adult and Dislocated Worker funds.

Ohio will track outcomes using WIOA primary indicators of performance, supplemented by waiver-specific measures such as retention rates, wage progression, and employer participation. Data will be collected through existing case management and performance reporting systems.

7. Accountability and Oversight of Federal Funds

Ohio will ensure accountability for federal funds associated with approved waivers by:

- Maintaining written approval documentation for each waiver;
- Monitoring waiver implementation through programmatic and fiscal oversight;
- Requiring periodic reporting from local areas on outcomes and expenditures;
- Rescinding or modifying waivers if compliance or performance concerns arise; and
- Reporting waiver activity and outcomes to the U.S. Department of Labor in quarterly WorkFlex reports in accordance with 20 CFR 679.640(b).

If a waiver is later determined to exceed allowable authority, Ohio will immediately rescind the waiver, notify affected local areas, and take corrective action as necessary.

8. Duration of WorkFlex Plan

Ohio requests approval of this WorkFlex Plan for a period aligned with the State's WIOA State Plan period of performance, not to exceed five years, consistent with federal regulations.