



Illinois Department of Commerce

& Economic Opportunity

OFFICE OF EMPLOYMENT & TRAINING

Bruce Rauner, Governor

October 12, 2018

WIOA Waiver Coordinator
200 Constitution Ave, NW S-4203
Washington, DC 20001

ATTN: WIOA Waiver Coordinator

Illinois is requesting a waiver to allow Illinois' current from the following Section(s): WIOA Sec. 106(a)(2) and 20 CFR § 679.210 (including preamble below).

"In accordance with WIOA Section 106(a)(2), a single local area may not be split across two planning regions. Local areas must be contiguous to be a planning region and effect where it can be shown that greater positive benefits to the workers and communities can be achieved."

Since the passage of WIOA, Illinois has proactively coordinated regional planning in the implementation of the WIOA requirements. These efforts led to the state naming meaningful planning regions that resulted in the 10 Economic Development Regions (EDRs). To support this process, Illinois developed regional planning guidelines, coordinated regional and statewide planning events, and provided technical assistance resources as part of the establishment of the WIOA regional plans in 2016. With the release of the final WIOA rules, the state updated planning resources in 2017 and then again in early 2018 to garner consultation with local chief elected officials, local workforce board members and other interested stakeholders for the purposes of subsequent designation and alignment with planning regions.

Under WIOA Sec. 106(b)(2), 20 CFR § 679.250(a), and TEGL 27-14, the Governor must approve a request for initial local area designation from any area that was one under the Workforce Investment Act of 1998 (WIA) for the 2-year period preceding the date of enactment of WIOA; provided the local area had performed successfully and sustained fiscal integrity during that 2-year period. All twenty-two of Illinois' Local Workforce Innovation Areas (LWIA) met the requirements for initial designation based on analysis of fiscal integrity and WIOA performance. Illinois identified ten planning regions that meet the requirements of WIOA Sec. 106(a)(2) and 20 CFR § 679.210.

Five of the 22 LWIAs (4/Ogle, 11/Livingston, 19/DeWitt, 21/Calhoun, Jersey and 23/Douglas) that meet the requirements for designation crossover between planning regions. Furthermore, WIOA Sec. 106(b)(2) and 20 CFR § 679.250(a), states the Governor may not reconfigure Illinois' initially-designated local areas for subsequent designation without consultation with local area chief elected officials, local workforce development boards, and other interested stakeholders. Given these LWIAs as designated

have sustained fiscal integrity and met performance, the Governor is unable to reconfigure these areas without consultation.

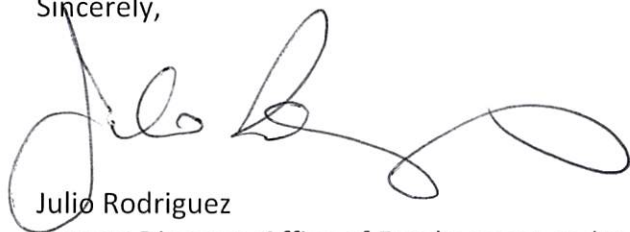
While these LWIAs meet the requirements within statute and regulation, the Governor did undertake an extensive process to consult with the local boards and elected officials, to identify a regional planning structure that would not result in any single local area split between two or more regions. This consultative process provided the opportunity for these stakeholders to voice their concerns over realignment and demonstrate why the configurations should remain.

The local feedback expressed concerns that focusing the realignment decision on labor market information is a “one-size fits all” approach that does not focus on the complete composition of the counties and communities. Additionally, the State received feedback about the administrative burden of realigning the counties and that this process would divert time and resources from serving job seekers, businesses the community.

Because of these concerns and as importantly, the impacted counties and local workforce areas have demonstrated that they have been successful in planning and delivering services in the context of the current regional and local workforce area boundaries. Illinois is pursuing this waiver. If granted this waiver will ensure the continuity of service in the impacted counties and removes a barrier that impedes the State’s efforts to improve the workforce, education and economic development systems in Illinois.

We appreciate your consideration of this request and seek an expedited response so that we may be able to move forward in our efforts. Please contact me with any questions you have or if you need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Julio Rodriguez', with a long, sweeping flourish extending to the right.

Julio Rodriguez
Deputy Director, Office of Employment and Training

Cc: Christine Quinn, USDOL ETA Region V Administrator