December 2, 2020

U.S. Department of Labor
Employment and Training Administration
90 7th Street, Suite 17-300,
San Francisco, CA 94103-1516

Attn: Carol Padovan – ETA FPO

RE: REVISED WIOA Waiver Request for Guam

Hafa Adai!

This letter is written as a waiver request for Guam with Workforce Innovation and Opportunity Act (WIOA) Statewide funds only.

As part of its new 4-year 2020 Combined State Plan being submitted for Program Years 2020-2023, Guam is requesting consideration of the following waiver which will be new to Guam.

<table>
<thead>
<tr>
<th>Statutory/Regulatory Provision</th>
<th>Reduce Out-of-School Youth (OSY) Expense Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reference(s)</td>
<td>WIOA Section 129(a)(4)(A) and 20 CFR 681.410</td>
</tr>
<tr>
<td>Recipient</td>
<td>Guam</td>
</tr>
</tbody>
</table>

Guam is requesting for this waiver to lower the Out-of-School Youth (OSY) expenditure requirements for statewide activities from 75% to 50% of the total funds received.

The waiver will allow us to provide services and support to our eligible youth to assist them with workforce training and work experience with our youth programs as well as to re-introduce summer youth programs and this includes training to decide which CTE program or career development program or similar programs to pursue with our education partners, the Guam Community College and the University of Guam as well as Eligible Training Providers.

This is to meet the workforce needs of young workers and employers to increase economic growth in Guam and the region, one of the goals within our State Plan.

Statutory and Regulatory Sections to be Waived: WIOA Section 129(a)(4)(A) and 20 CFR 681.410.
Projected Programmatic Outcomes from Implementation of Waiver:

We would like to align youth services with Guam’s new Strategic Goals for our new 2020 Combined State Plan to increase the earning capacity of Guam’s workforce system customers by maximizing access to employment. Guam Department of Labor is prepared to help the workforce make informed decisions. This requires engaging everyone from parents, to workers to educators and employers to meet workforce needs.

We want to increase the earning capacity of Guam’s workforce system customers by maximizing access to and use of skills and credentialing. For Youth, Career Pathways guidance is imperative so the workforce is educated and afforded to develop new skills through training and education for skills enhancement and gainful employment.

We want to increase the earning capacity of Guam’s workforce system customers by maximizing access to and use of life management skills. Develop workers to be more qualified in marketable skills obtained through training and apprenticeship programs offered at the American Job Center and in collaboration with credentialing.

We want to increase the earning capacity of Guam’s workforce system customers by eliminating barriers to employment. Assessments are to be conducted to gain insight to remove barriers to employment with job seekers who need to upgrade employment skills. Individuals with barriers to employment include youth with disabilities, ex-offenders, low income individuals and long-term unemployed or underemployed residents.

We want to support job seekers and those with barriers to employment. Guam is ready to assist and prepare Guam’s youth to be educated and engaged in work experience. We want to reach out to more participants in our next summer youth program. The period for this summer program will be 6 weeks for 2 cohorts and we intend to serve at least 200 youth for the summer program. The program will be administered by the department in partnership with the Guam Department of Education, the Guam Community College (GCC) and the University of Guam (UoG).

Priority will be given to economically disadvantaged in-school youth who are at risk, homeless, juvenile youth offenders/ex-offenders, youth with a disability, and pregnant or parenting youth. The period for this summer program is 6 weeks for 2 cohorts serving 200 youth participants.

At the American Job Center (AJC) we want to encourage online learning with information technology and upskill and reskill individuals with barriers to employment so that they become more efficient to meet employer expectations and perform new and improved skills for the employer and have a higher earning capacity with new and improved marketable skills.
THE ISLAND OF GUAM  
WIOA WAIVER REQUEST

1. A discussion of how the waiver complements Department of Labor priorities (i.e. expansion of apprenticeship, improved employer engagement, etc.).

Guam has used youth funding to serve In-School-Youth (ISY) in the past through summer programs that helped students with work based learning experiences that provided them with their first ever exposure to jobs in their young lives. We would like to revive the summer youth programs to have this opportunity not only benefit the students but employers too as the employers will be able to maximize the opportunity and train the individuals so that they will be prepared to enter their respective industries. This request would help Guam serve and prepare more In-School-Youth (ISY) for jobs in workforce development.

2. Individuals, groups, or populations benefitting, or otherwise impacted by the waiver from the waiver.

Through the waiver, more In-School-Youth (ISY) will have the opportunity to experience work based learning opportunities as well as be exposed to work place environments and employer engagement. This will provide the students with first hand experiences into the fields of their choice and to see whether or not they should pursue such career, enter into a career pathway program, enter into higher education or technical trades preparation or switch choices and pursue other fields.

Most if not all Guam youth in the Guam Department of Education (GDOE) public school system participate in the FREE Lunch program. Some students come from households of low income or who have parents that are not college educated or did not work in a job as wage earners. These students want to be able to achieve a better life for themselves and also for their families. This opportunity will help to motivate students to stay in school and complete or seek higher education.

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

Progress of the youth participants will be monitored accordingly by the Guam Department of Labor One Stop staff who serve as case managers and compared against Guam’s youth performance targets. Performance measures will be monitored and data will be provided to U.S. DOL ETA on the progress made with these youth participants within the Annual State Performance report. The period covered for this waiver will be for PY2020.
Assurance of state posting of the request for public comment (including the dates that the state made the draft request available for public comment) and notification to affected local workforce development boards.

A Public Comment period will be posted on our GDOL website for December 9 and 10, 2020 and will include the University of Guam (UoG) and Guam Community College (GCC) as well as the Guam Department of Education (GDOE) and other workforce stakeholders.

Should you have any questions, please contact our office at (671) 475-7044. We look forward to a favorable response from your office.

Respectfully,

David Dell’Isola
Director