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**MEMORANDUM**

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**TO:** EXECUTIVE DIRECTORS  
**FROM:** WILLIE F. BLANTON, WIA DIRECTOR  
**SUBJECT:** REQUEST FOR WAIVER  
**DATE:** 2/11/2005  
**CC:** LWIB CHAIRS, VICE-CHAIRS, BRIAN DAVIS, RAYMOND COUSINS

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The Virginia Employment Commission will request a waiver on the regulatory prohibition of using Individual Training Accounts (ITAs) for out-of-school and/or older youth using youth funds. This would allow out-of-school and/or older youth to use ITAs to access occupational skills training through the Eligible Training Provider list.

The benefits of this waiver would be:

- Increased efficiency and customer choice.
- Eliminate the cumbersome requirement for concurrent enrollment of an out-of-school/older youth in order to meet the requirement to access occupational skills training offered through the Adult Individual Training Account and Eligible Training Provider List.
- Eliminate the need to track resources separately for each funding stream.
- Expand the training opportunities for youth in demand occupations that can enable the youth to become self-sufficient.
- Allow Youth to be counted only in the youth measures instead of in both youth and adult measures.

Other states that have had this type of waiver approved include Tennessee, Illinois, California, Georgia, Indiana, etc...

A public comment period for this request will began December 20, 2004 and end on January 31, 2005. The VEC is requesting you to place this waiver request on your next board meeting agenda for discussion and to forward the board's reaction, whether positive or negative, to Raymond Cousins. Mr. Cousins can be contacted by email or fax.

Email is [Raymond.Cousins@vec.virginia.gov](mailto:Raymond.Cousins@vec.virginia.gov)

FAX is 804-225-2190

Thank you for your attention to this important matter.

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