

Comment #	Commenting Organization	Comment	Response
1	UniqueSource Products and Services	<p>UniqueSource Products and Services appreciates the opportunity to submit comments on Pennsylvania's 2020-24 WIOA Combined State Plan Modification draft. UniqueSource commends the Administration for the thoughtful goals and strategies contained in the Plan Modification document focused on providing services to help remove barriers to employment.</p> <p>UniqueSource supports and aligns with PA's Employment First focus as we promote our mission to advance employment opportunities for Pennsylvanians with disabilities.</p> <p>UniqueSource and our member network of affirmative employers who, through creating mission focused management and operational structures, prioritize providing adaptive technologies, effective accommodations, and support, strive to not only meet, but also exceed the requirements of the ADA in order to maximize the employment potential and productivity of persons with disabilities.</p> <p>We hope that the Administration and supporting Agencies like Labor and Industry and DHS will continue to consider UniqueSource as reliable partner program agency and resource we all continue to improve, evolve, and expand upon the work we do to support inclusion and independence for Pennsylvanians with disabilities through employment.</p>	<p>Thank you for your comment.</p> <p>We continue to prioritize positive employment outcomes in alignment with Employment First policy for individuals with disabilities.</p>
2	PWDA	<p>(pg. 8) Employers' Employment Needs With regard to the industry sectors and occupations identified in (A)(i) and (ii), provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses</p> <p><b>Comment:</b> We are encouraged by the PWDB's updated analysis and labor market information, including those indicative of competitive industry sectors across Pennsylvania. We ask the PWDB to outline its</p>	<p>Thank you for your comment.</p> <p>We plan to publish updated industry clusters, as well as identify targeted industry clusters, by July 1, 2022. Current industry clusters are identified on pages 9 and 10 of</p>

		intention in the Plan to guide an updated identification of industry clusters, establish a schedule for its ongoing evaluation, as well as an annual publication of the targeted industry clusters as outlined in Section 1302 of the PA Workforce Development Act.	the current WIOA Combined State Plan modification.
3	PWDA	<p><i>(page 31) Section II-Strategic Elements-State Strategy (2) Describe the strategies the State will use to align the core programs, any Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available to the State to achieve fully integrated customer services consistent with the strategic vision and goals described above. Also describe strategies to strengthen workforce development activities regarding weaknesses identified in section II(a)(2).</i></p> <p><b>Comment:</b> The modified plan does not effectively express the critical need to leverage resources through integration of services whenever possible.</p> <p>The LWDBs agree that the workforce development system (both statewide and locally) extends beyond the core programs as indicated on page 38 which states <i>“Core and partner programs will collaborate to ensure that resources are leveraged, and services are not duplicated.”</i> However, this statement, along with references throughout the draft to service integration, underestimates the significant disruption to local systems when workforce resources are not effectively leveraged or are removed altogether. The far-reaching implications of significant changes that have an impact on customer flow, funding levels or one-stop service delivery are not addressed.</p> <p>As each local workforce development area strives to “Build Back Better” from unprecedented shifts in local workforce and economic development systems, long-term planning must include the full range of</p>	<p>Thank you for your comment.</p> <p>The TANF section of the plan has now been included in the WIOA Combined State Plan Modification that will be considered for approval by the PA WDB on February 9, 2022. While the VR Services portion of the plan is not currently included, it will be included in the submission to the WIOA Combined State Plan portal. The VR services portion of the Plan will be subject to its own additional public comment period, which was requested by the Rehabilitative Services Administration, US Department of Education, due to substantive changes to that portion of the Plan.</p> <p>Pennsylvania understands the critical value of each partner to the success of the workforce development system and will</p>

		<p>available resources and services for Pennsylvania’s jobseekers, workers, and employers. Never has a fully integrated system been more important – not only to maximize resources but also to ensure service delivery is equitable.</p> <p>This is stated but not necessarily emphasized in the modified plan as drafted. As example, the statement explaining the exclusion of the Temporary Assistance for Needy Families (TANF) plan in the draft should, at the very least, address the potential impact of that plan on the PA CareerLink® one-stop centers’ infrastructure and service delivery to both job seekers and employers.</p> <p>An interagency work group, coordinated by the PWDB, in addition to a One-Stop Service Delivery Committee are promising. However, it is essential that both groups receive a thorough overview of the implication of any partner agency changes that would alter customer flow, funding levels or one-stop service delivery in each PA CareerLink®.</p> <p>The lack of plan content from the TANF partner (pg. 242) and the OVR core program (pg. 127) depicts a parallel, but fragmented approach to planning a <i>Combined</i> plan. We ask the PWDB to incorporate within the plan its approach to support and develop an aligned and integrated system encompassing the six core programs and additional combined state plan partner programs as outlined in 20 CFR § 676.100.</p>	<p>work to continuously improve how these programs and services are integrated and coordinated to ensure the best and most comprehensive services for all customers.</p> <p>Additionally, the PA WDB One-Stop committee will ensure that all core and partner programs have the opportunity to share any proposed changes to program operation that could impact PA CareerLink® operations in the commonwealth. This is now reflected in goal 5.9 on page 30 of the WIOA Combined State Plan modification.</p>
4	PWDA	<p><i>(page 91) (D) Provide the appeals process referred to in section 121(h)(2)(E) of WIOA relating to determinations for infrastructure funding.</i></p> <p><b>Comment:</b> We welcome a thorough examination of the inputs required to properly fund an effective and customer-centered PA CareerLink® system across Pennsylvania. All too often, evaluation of PA CareerLink® focuses on outcomes and outputs without respect of the necessary inputs to serve the workforce system customer base.</p>	<p>Thank you for your comment.</p> <p>An updated MOU Infrastructure Funding Policy is currently being developed and is scheduled to accept public comments in May 2022. This policy will also be reviewed by agency leadership representing all core and partner programs.</p>

		<p>Based on widespread reports, core and mandated partners including but not limited to the Unemployment Compensation system are not adequately investing in the local service delivery system based on the proportionate share requirements and reasonable benefit or utilization by the customer base. We encourage the PWDB to engage with LWBDs and PA CareerLink® providers, as well as engage in a data-informed and customer centric approach to crafting the State Funding mechanism policy and welcome further discussion with PWDB to identify ways PWDA could assist where appropriate.</p>	<p>We recommend providing specific comments to this policy during that public comment period. We will also share these comments with the policy development team.</p>
5	PWDA	<p><i>(page 107) (4) Describe how the State will implement and monitor the priority for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient in accordance with the requirements of WIOA sec. 134(c)(3)(E), which applies to individualized career services and training services funded by the Adult Formula program.</i></p> <p><b>Comment:</b> We support the Employment Program Committee’s comment on the priority of service provisions and ask the PWDB to simply re-insert the definitions and examples from prior approved WIOA plans into the plan. Note that the EPC is <b>not</b> proposing new language, but rather that language from the 2016-20 and 2020-24 WIOA Combined State Plan be restored virtually verbatim.</p>	<p>Thank you for your comment.</p> <p>We agree with the importance of the Priority of Service policy to ensure services are provided to Pennsylvanians who most need them.</p> <p>By referencing the policy and link in the WIOA Combined State Plan, this allows e updates to the policy to be made without having to submit a new modification to the WIOA Combined State Plan.</p> <p>An updated Priority of Service Policy is currently being developed and is scheduled to accept public comments in February 2022. This policy will also be reviewed by agency leadership representing all core and partner programs. We recommend providing specific</p>

			<p>comments to this policy during that public comment period. We will also share these comments with the policy development team.</p>
6	PSU	<p>In contrast to previous National HIV/AIDS Strategies, the revised National HIV/AIDS Strategy 2022 to 2025, includes a whole government approach including representation from the Department of Labor on the Federal HIV Strategic Planning Taskforce. At the state level, the PA Statewide HIV planning group recently added a goal to <i>increase capacity and implementation of activities for greater access to vocational development and employment services and evaluation of these services on HIV health and prevention outcomes.</i></p> <p>Although existing biomedical interventions provide a pathway to end the HIV epidemic, unemployment, insecure work, and/or precarious work conditions can interfere with positive HIV health and prevention outcomes. Advancements in HIV medicine have led to improved health and more restrictive access to Social Security and/or disability benefits creating an increased desire and/or need to work for many people living with HIV (PLWH). Transitions into or out of the workforce, can increase the risk of poor health associated with stress and potential disruptions or loss of access to income support and health insurance. When PLWH have undetectable viral loads they no longer are at risk of transmitting HIV to others.</p> <p>Poor health outcomes and lack of access to HIV care can lead to disruptions in medication adherence increased viral load and increased risk of forward HIV transmission.</p> <p>Changes of employment status associated with COVID-19, with a disparate increase in unemployment among low income, ethnic minority, and female workers with HIV, have underscored the urgency to better serve this population. The Center for Diseases Control’s HIV Medical</p>	<p>Thank you for your comment related to the two-year modification of the 2020-2024 Pennsylvania Combined State Plan specific to the employment challenges of people living with HIV (PLWH). The PA Office of Vocational Rehabilitation (OVR) remains committed to meeting the vocational needs of all Pennsylvanians who have a disability that presents a barrier to successful employment planning. OVR is planning to further evaluate the vocational and employment needs of PLWH through the next three-year Comprehensive Statewide Needs Assessment.</p> <p>Thank you for sharing your comments and thoughts with us.</p>

		<p>Monitoring Project MMP collects data on a representative sample of PLWH in the US and estimates that 41% of PLWH are unemployed. Yet in 2021 only 84 of the 36,494 PLWH in PA were receiving vocational rehabilitation services.</p> <p>Lack of access to vocational services can limit the capacity to make informed decisions about changing employment status and increase the risk for negative economic and health outcomes associated with employment transitions. Employment transitions effect health equity as it contributes to key factors related to health such as income, quality of life, HIV stigma, social networks, self-esteem, and safety. Despite the importance of work, little attention has been devoted to providing employment services to PLWH in PA. Even less attention has considered the impact of disparate access to vocational resources that impact economic opportunities as well as individual and public health outcomes.</p> <p>In light of these factors, I urge you to devote specific attention and resources to addressing the unmet employment needs of PLWH and to help to contribute to ending the HIV epidemic in PA.</p>	
7*	<p>Community Legal Services</p> <p>Employment Program Committee</p> <p>Community Justice</p> <p>Coalition for Low-Income Pennsylvanians</p>	<p>While the proposed provisions on priority of service in the modified 2020-24 WIOA state plan are basically true to the original provisions on this topic in the 2016-20 and 2020-24 Combined WIOA State Plans, they omit language from the original state plans that are important to ensure a clear understanding of the meaning of priority of service, as well as its proper implementation. More specifically, the proposed modified state plan omits definitions of key priority of service terms and several examples of how priority of service works in practice. What we propose is simply that these definitions and examples be inserted back into the plan. We emphasize here that we are <b>not</b> proposing new language, but rather that language from the 2016-20 and 2020-24 WIOA Combined State Plan be restored virtually verbatim. We have attached the priority of service provisions on pages 107-109 in the proposed modified state</p>	<p>Thank you for your comment.</p> <p>By referencing the policy and link in the WIOA Combined State Plan, this allows e updates to the policy to be made without having to submit a new modification to the WIOA Combined State Plan.</p> <p>An updated Priority of Service Policy is currently being developed and is scheduled to</p>

		plan with the omitted language inserted in track change so that it can be easily identified.	accept public comments in February 2022. This policy will also be reviewed by agency leadership representing all core and partner programs. We recommend providing specific comments to this policy during that public comment period. We will also share these comments with the policy development team.
8*	Community Legal Services Employment Program Committee Community Justice Coalition for Low-Income Pennsylvanians	We note also that the 2020-24 WIOA Combined WIOA State Plan made reference, at the end of the priority of service section, to a stand-alone statement of Priority of Service policy dated 2015 (identified as <i>WORKFORCE SYSTEM POLICY (WSP) No. 05-2015, December 23, 2015, entitled, "Priority of Service – Initial Implementation of the Workforce Innovation and Opportunity Act"</i> ), noting that this "initial" statement of policy was going to be updated to "align with the State Plan and federal regulations." The proposed modified state plan also refers to this stand-alone policy, but our research suggests to us that it has not, in fact, been revised since 2015. We recommend that the stand-alone statement of priority of service policy be updated to align with the current WIOA State Plan priority of service provisions and that notice and opportunity for comment be provided to stakeholders, such as EPC.	Thank you for your comment.  An updated Priority of Service Policy is currently being developed and is scheduled to accept public comments in February 2022. This policy will also be reviewed by agency leadership representing all core and partner programs. We recommend providing specific comments to this policy during that public comment period. We will also share these comments with the policy development team.

\* Proposed language to be reinserted was provided