

WIOA Regional and Local Area Plan Guide

This guide, templates and other supporting documents instruct the preparation, development, submission and approval of program years, or PY, 2021 – 2024 Workforce Innovation and Opportunity Act, or WIOA, regional and local area plans, subsequent review and modification, if applicable. WIOA requires the creation of regional and local area plans every four years and modification two years after the respective effective dates. WIOA planning requirements seek federal investment alignment in job training and education, service delivery integration across programs, improvement in service delivery efficiency and verification of the workforce system matching job creators with skilled individuals. Such planning cultivates development of more comprehensive and integrated approaches for addressing the needs of job creators and workers; it enables the system to provide a wider range of coordinated and streamlined services to their shared customers. As described in Pennsylvania’s *WIOA Combined State Plan* and subsequent modification, workforce development systems in Pennsylvania invest in innovation, employer engagement, accountability structures and improved data to create a comprehensive workforce development system consistent with the governor’s strategic vision. Collaboratively developed plans are best positioned to accomplish Pennsylvania’s goals and transcend the fragmentation of workforce development programs.

This guide, templates and other supporting documents are based largely on WIOA Sections 106, 107 and 108 and their respective regulations. Fillable templates and supporting documents found on the Pennsylvania Department of Labor & Industry, or L&I, website include the Planning Policy, Supporting Information and Planning References, WIOA Regional and Local Area Plan Instructions, WIOA Regional and Local Area Plan Templates, WIOA Plans Submission Checklist, Submission Cover Letter template, WIOA Plan Modification Forms, Local Area WIOA Title I Programs Performance Accountability template, Local Workforce Development System Organizational Chart model, Local Workforce Development System Program Partner-Provider List template and Local Workforce Development System Supporting Data template. For submission of planning related forms and required documentation, or to ask technical questions, email the Bureau of Workforce Development Administration, or BWDA, resource account at RA-LI-BWDA-Policy@pa.gov.

I. Regional and Local Area Plan Composition Guidance.

Introduction. WIOA sets parameters for state, regional and local workforce development systems throughout the country, mandating resource sharing and alignment of priorities across multiple systems, programs, partners and providers to ensure a skilled workforce today and in the future. The regional and local area plans develop, align and integrate the area’s job-driven workforce development systems, and provide the platform to achieve the area’s vision, strategic goals and operational deliverables. These plans require a shared understanding of an area’s workforce development needs, a shared vision of how the public workforce development system can be designed to meet those needs and a shared agreement on key strategies to realize this vision. While both plans identify and describe related subjects, WIOA regional and local area plans do so from notably different vantage points.

A region, used without further description, is an area identified by Pennsylvania in accordance with WIOA section 106(a). L&I has designated the Pennsylvania Department of Community and Economic Development’s, or DCED, ten Partnerships for Regional Economic Performance, or PREP, regions as workforce development regions. There are five planning regions and five single local area regions.

Planning Region. A planning region is a designated area that is comprised of two or more local workforce development areas, or local areas, that are (collectively) aligned within a region. In Pennsylvania, there are five designated planning regions: Northeast, Northwest, South Central, Southeast and Southwest.

Single Local Area Region. A single local area region is a designated area that is comprised of a single local area. In Pennsylvania, there are five such regions: Central, Lehigh Valley, North Central, Northern Tier and Southern Alleghenies.

II. Planning.

A. Regional Planning

Note: *Only “Planning Regions” are required to submit regional plans.*

Regional Partnerships. Workforce system stakeholders must consider increasing regional partnerships for general effectiveness. Regional partnership (including intra-regional collaboration) facilitates alignment of workforce development activities with regional economic development activities. It supports the execution and implementation of Sector Strategies and Career Pathways with the likelihood of increasing public returns on investment. Regional cooperation may also lower costs and increase effectiveness of service delivery to businesses spanning to more than one region’s local areas and to job seekers through coordination of shared services, processes and operations. Regional partnerships must include the region’s collective core program partners and the required program partners throughout a planning region.

Regional Discussions and Planning Committees. The regional plan is essentially a discussion of the strategies within a planning region, in written narrative, focused on strategic alignment with coordinated and collaborative efforts. Workforce system stakeholders must establish a regional planning committee for the specific purpose of the regional planning process. Collaboration with applicable program partners and other stakeholders within the planning region is necessary to prepare, develop and submit a WIOA regional plan.

Regional Plans. Each local workforce development board, or local board, their respective chief elected official(s), or CEO(s), and other local workforce system stakeholders within a planning region must:

- 1) Use the regional plan template and *Appendix B: Regional Plan Instructions* located on L&I’s website.
- 2) Prepare, submit and obtain approval of a regional plan that:
 - satisfies the requirements of WIOA Section 106; 20 CFR Part 679 Subpart D; and L&I policy. The local board(s) and CEO(s) must also jointly approve the regional plan;
 - provides an opportunity for public comment consistent with Section III: *Public Comment Period* in this guide;
 - incorporates local plans for each of the local areas in the planning region; and
 - regularly makes public plan information available electronically and through open meetings.

B. Local Area Planning.

Note: *Each local board is required to submit a local area plan.*

Local Partnerships. Local workforce system stakeholders must consider increasing partnerships for general effectiveness. Local partnership (including core, required and additional partners) facilitates alignment of workforce development activities within a local one-stop system. It better supports the execution and implementation of local strategies and initiatives with the likelihood of increasing public returns on investment. Local cooperation may also lower costs and increase service delivery effectiveness through the coordination of shared services, processes and operation.

Local Discussions and Planning Committees. The local area plan is essentially a discussion of the implementation of cross-partner and cross-program strategies within the local area, in written

narrative, focused on program alignment. Workforce system stakeholders must consider the development of planning committees for the specific purpose of the local planning process. Collaboration with the applicable stakeholders within the local area is necessary to prepare, develop and submit a WIOA local area plan.

Local Area Plans. The local board, its respective CEO and other executive decision-making officials of required and additional one-stop system [WIOA Section 107(d)(3)] within both a single local area region and planning region must:

- 1) Use local area plan fillable template and *Appendix C: Local Area Plan Instructions* located on L&I's website.
- 2) Prepare, submit and obtain approval of a local area plan that:
 - satisfies the requirements of WIOA Section 108; 20 CFR Part 679 Subpart D; and L&I policy. The local board and CEO(s) must also jointly approve the local area plan;
 - supports, and is consistent with, the vision, goals and strategy as described in Pennsylvania's *WIOA Combined State Plan* or subsequent modification;
 - provides an opportunity for public comment consistent with Section III: *Public Comment Period* in this guide; and
 - regularly makes public plan information available electronically and through open meetings WIOA Section 108(d)(1).
- 3) *This step only applies to wherever a local area is designated as part of a "Planning Region."* Align with the regional plan (see *Appendix B: Regional Plan Instructions*) and be submitted as a regional plan component.
 - Due to the nature of the regional plan prompts, the local area plan will occasionally request answers that are similar, if not the same, as what is required in the regional plan. The answer does not need to be duplicated in the local area plan. As such, *Appendix C: Local Area Plan Instructions* are edited to guide the "Planning Region" local area plan drafters when these instances occur.

III. **Public Comment Period.** Local area plans, and the associated regional plan, if applicable, must be posted on the submitting local board's official internet site as one cohesive document for a *30-day public comment period*. Public comment and input provide an opportunity for interested stakeholders to participate actively, effectively and transparently in the development of the plan. Notification of the posting must be made simultaneously to all relevant regional and local area stakeholders, interested parties and L&I. To allow for adequate opportunity for such comment, local boards must:

- Make copies of the proposed regional, if applicable, and local area plan (or subsequent review and modification) available to the public through electronic and other means such as public hearings and local news media;
- Publish the proposed plans on the local board's website;
- Ensure that proper public notice is provided;
- Include an opportunity for comment by members of the public;
- Provide a 30-day period for comment on the plan or subsequent review and modification before its submission to L&I, beginning on the date on which the proposed plan is made available; and
- Submit any comments that express disagreement with the plan, as well as the action taken by the local board in response to the comments, along with the plan.

Section IV: *Plan Submission Requirements and Approval*, sub-section A: *Plan Submission Requirements*, includes information on the public comment/notice verification process.

IV. Plan Submission Requirements and Approval. All regional and local area plan packages must be submitted electronically by a regionally designated single point of contact, or POC, to BWDA’s Policy & Planning Coordination Services unit’s resource account at RA-LI-BWDA-Policy@pa.gov. A copy of the email must be sent to all local board chairpersons and CEOs within a region or local area and contain the subject line “[Region Name] WIOA Regional Plan Modification” by close of business on the deadline indicated in this guidance.

A. Plan Submission Requirements. Prior to submission, the local boards must:

- Provide a *Submission Cover Letter*. Use letterhead from the submitting local board and do not exceed one (1) page. The letter is limited to the content on the *Submission Cover Letter Template*; refer to the template for additional direction. During the four-year plan, the cover letter is addressed to the Deputy Secretary for Workforce Development of Pennsylvania; the modification cover letter is addressed to the Bureau of Workforce Development Administration Director. The letter briefly describes the reason(s) for the plan; includes a timeline, benchmarks achieved and local board engagement; it must describe the public comment status and state if public comments are received or not. The letter must contain a brief description of significant changes to the plan because of public comments. It must indicate that the CEO, the local board chair member and the full local board reviewed and agreed with the submitted plan. The letter is signed and dated by the local board’s Chair and the respective local area’s CEO and is submitted with the “clean copy” of the regional, if applicable, and local area plan(s).
- Provide an electronic copy (in Microsoft Word) of the plan and all supporting documents (either in Microsoft Word or PDF). Each local area plan, and associated regional plan, if applicable, must be submitted to L&I as a unique, separate document. Due to L&I’s email system restrictions, the point of contact, or POC, must ensure that any emails submitted must not exceed a maximum of 10 megabytes. Separate plan documents are not to exceed a maximum of 10 megabytes. Ensure the submitted plan uses the structure and format provided; each page of the plan is numbered; and the default typeface (Calibri 11) is used. When plan modifications are necessary, to ease the review burden and improve L&I feedback, use the Track Changes function in Microsoft Word.
- Provide documentation showing that the submitting local board published the public notice inviting public comment and that the public notice is published for the required 30 days, in accordance with WIOA Sec. 108 and 20 CFR Part 679. The notice, at a minimum, must summarize the plan, provide the dates of the comment period and how to submit comments. Public notice must account for local area(s) affected by the plan creation and/or subsequent review and modification. Stakeholders and interested parties, including L&I agencies, must be notified of the public notice’s posting, and how the notice’s subject (i.e., the plan and supporting documents) may be accessed.

BWDA will accept the following as evidence for fulfilling public notice requirements:

- if the public notice was posted on the local board’s website, provide: 1) a screen print of the online posting and website information providing evidence of the first date the public comment

period began, and 2) documentation of how stakeholders were informed of the public comment period (e.g., an e-mail to stakeholders and other interested parties).

- if the public notice was published in the local news media, provide: 1) a copy of the advertisement from the news media; and 2) a billing receipt showing dates of publication.
- Provide a copy of all public comments received and local board’s comment acknowledgements.
- Verify dates on all submitted documents align (i.e., the board approval date must be the same date on the cover letter, the submitted plan and only at time of subsequent plan modification, the WIOA Plan Modification Forms. The effective date must be the same on the submitted plan and only at time of subsequent plan modification, the WIOA Plan Modification Forms).
- Review and verify the *WIOA Plans Submission Checklist* is completed; refer to the checklist for additional direction.

B. Approval. Original and modified regional and local area plans will be reviewed and recommended for the Governor’s, or designee, approval based upon the requirements outlined in L&I policy, this guidance and plan-specific documents. **The effective date of the PY 2021-2024 WIOA regional and local area plan modification is July 1, 2023.**

Regional and local area plan packages will be reviewed upon receipt. BWDA will notify the submitting local board’s POC when the original plan or plan modification, if applicable, submission is received. BWDA may request clarifying information or provide feedback to revise the plan. If the plan/modification(s) is approved, the submitter will be directed to provide a “clean” version of the approved plan to BWDA so that it may be included with the approval letter. BWDA will email a letter notifying the submitting local board Executive Director, CEO and local board Chair of the disposition of the plan and/or modification (approval/denial).

The submission deadline for the PY 2021-2024 WIOA plan modification is February 24, 2023.

Plan(s) submitted to L&I are considered approved if:

- L&I provides notification of approval to local area CEO and local board Chairperson; or
- At least 90 days have passed since the submission of the draft plan without the submitting local board receiving any communication from L&I.

L&I may choose not to approve a plan submission for any of the following reasons:

- Deficiencies in workforce investment activities are identified in the region or local area and the designated area has not demonstrated acceptable progress in implementing corrective actions;
- The plan does not comply with the applicable provisions of WIOA and its regulations;
- The plan does not align with the PA WIOA Combined State Plan and subsequent modification;
- The plan does not include local area plan submissions from the local board(s) within a workforce planning region; or
- Other reasons as L&I may determine appropriate.

Public Posting of Approved Plan: Local boards must publicly post their approval letter, approved regional, if applicable, and local area plan(s) and supplemental plan information on the local board's website within 90 days of approval. Required supplemental plan information includes Attachment 1: Local Area WIOA Title I Performance Accountability template; Attachment 2: Local Workforce System Organizational Chart model; Attachment 3: Local Workforce Development System Program Partner-Provider List template; and if applicable, Attachment 4: Local Workforce Development System Supporting Data template.

Note: Updated supplemental plan information will not require plan modification as it is expected the local board will make timely revisions to the supplemental plan information.

- V. **Structure Exceptions.** Consistent with the *Local Governance* policy, those local areas that require a structure exception, must include such narrative within the local area plan. See *Appendix C: Local Area Plan Instructions; Prompt 3.1* for additional details.
- VI. **Plan Modification.** Given the multiyear nature of the regional and local area plans, reassessing the effectiveness and labor market relevance, and when needed, adjusting strategies to respond to the changing economic conditions and workforce needs must occur. WIOA requires modification anytime underlying conditions shift or if plan elements are no longer valid, as detailed in WIOA sections 102(c)(3) and 108(a); therefore, to be compliant with 20 CFR Part 679, all current regional and local area plans must be reviewed, and appropriate modification completed at least every two years after the respective effective dates.

In accordance with WIOA §679.580(b), modifications to the local area plan should reflect changes:

- In the labor market and economic conditions; and
- Other factors affecting the implementation of the local area plan, including but not limited to:
 - significant changes in local economic conditions;
 - changes in the financing available to support WIOA Title I and partner provided WIOA services;
 - changes to the local board structure; and
 - the need to revise strategies to meet local performance goals.

All PY 2021 to PY 2024 WIOA plans modifications will be summarized within L&I's *WIOA Regional or Local Area Plans Modification Form* which is posted on the L&I website.