

WORKFORCE SYSTEM POLICY: PROGRAM YEARS 2021 – 2024 WORKFORCE INNOVATION AND OPPORTUNITY ACT REGIONAL AND LOCAL AREA PLANS

Local Workforce Delivery System

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Policy Owner: *Pennsylvania Department of Labor & Industry and State Agency Workforce System Partners*

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Purpose of the Policy

This policy, associated guide, fillable templates and other supporting documents provide information regarding 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 and subsequent review and modification, if applicable. WIOA plans promote integrated planning and system alignment, ensure compliance with applicable federal and state laws, regulations and policies, and support the vision, goals and strategies described in Pennsylvania’s *WIOA Combined State Plan*. This policy, associated guide, fillable templates and other supporting documents are based largely on WIOA Sections 106, 107 and 108 and their respective promulgating regulations.

Policy Statement

The local workforce development board(s), or local board(s), or LWDB(s), in partnership with the chief elected official(s), or CEO(s), for their respective designated region and local area, must develop and submit to the Governor, a comprehensive four-year regional plan if the region is deemed a planning region, and a corresponding local workforce development area, or local area, or LWDA plan. Regional plans must articulate how the respective planning region LWDBs will collaboratively achieve WIOA’s vision and goals, support and incorporate Pennsylvania’s WIOA Combined State Plan goals and strategies while realizing regional goals and strategies. Each LWDB, in collaboration with LWDA stakeholders, must produce a local area plan that embodies the vision, goals, objectives and strategies of WIOA, the PA WIOA Combined State Plan as well as certain administrative and operational elements or processes. WIOA regional and local area plans are subject to WIOA and its promulgating regulations, other applicable federal law and guidance, commonwealth law and directives, each program’s authorizing statute and its respective regulations as well as this policy.

Scope

This policy applies to employees of, as well as groups or individuals representing, all bureaus, division, boards, commissions, councils, agencies and business partners supported by the Pennsylvania Department of Labor & Industry, or L&I, allocated workforce development funds involved in the preparation, development, submission and approval of WIOA regional and local area plans.

Audience

Pennsylvania CEOs, LWDB members and local board staff, LWDA administrative entity staff, LWDA fiscal agent staff, executive decision-making officials of LWDA one-stop system program partners and any other entity or

individual associated with the preparation, development, submission and modification of WIOA regional and local area plans must adhere to the conditions of use and specifications as outlined.

Related State Policies

WSP No. 121-04 PA CareerLink® System Operator

WSP No. 121-03 Memorandum of Understanding, or MOU, for the One-Stop Delivery System

WSP No. 01-2015 Pennsylvania's Workforce System of Record (Change 1)

Definitions

Chief elected official, or CEO, is the chief elected executive officer of a unit of general local government in a local workforce development area. By legislation, the CEO is financially liable for workforce funds allocated to a local workforce development area. The CEO is also responsible for appointing local workforce development board members, approving the local workforce development board budget and serving as the local grant recipient.

Commonwealth Workforce Development System, or CWDS, is the sole data-management and reporting system of record used for all data collection and reporting related to all WIOA Title-I and Title-III, Wagner-Peyser Act and Trade Act-related activity in Pennsylvania.

Core programs are the partner programs found in WIOA title I (Adult, Dislocated Worker and Youth); title II (Adult Education); title III (Wagner-Peyser); and title IV (Vocational Rehabilitation).

Individuals with a barrier to employment is a member of one (1) or more of the following populations:

- A. Displaced homemakers;
- B. Low-income individuals;
- C. Indians, Alaska Natives and Native Hawaiians, as such terms are defined in WIOA Sec. 166;
- D. Individuals with disabilities, including youth who are individuals with disabilities;
- E. Older individuals (to mean an individual age 55 or older);
- F. Ex-offenders;
- G. Homeless individuals (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), or homeless children and youths (as defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434(a)(2)));
- H. Youth who are in or have aged out of the foster care system;
- I. Individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers;
- J. Eligible migrant and season farmworkers, as defined in WIOA Sec. 167(i);
- K. Individuals within two (2) years of exhausting lifetime eligibility under part A of title IV of the Social Security Act (42 U.S.C. 601 et. seq.);
- L. Single parents (including single pregnant women);
- M. Long-term unemployed individuals; and
- N. Such other groups as the Governor involved determines to have barriers to employment.

Local plan is a four-year action plan to develop, align, and integrate service delivery strategies and resources among the six WIOA core programs and partners in a specific local area. The local plan should support the achievement of the state's vision and goals, as outlined in the state plan.

Local workforce development area, or LWDA, also referred to as a local area, serves as a jurisdiction for the administration of workforce development activities and execution of adult, dislocated worker, and youth funds allocated by the state. Such areas may be aligned with a region identified in WIOA Sec. 106(a)(1) or may be

components of a planning region, each with its own LWDB. The Governor must designate local areas in order for the State to receive adult, dislocated worker, and youth funding under title I, subtitle B of WIOA.

Local areas are also the areas within which LWDBs oversee their functions, including strategic planning, operational alignment and service delivery design, and a jurisdiction where partners align resources at a sub-state level to design and implement overall service delivery strategies.

Local workforce development board(s), or LWDB(s) are regional entities created to implement the Workforce Innovation and Opportunity Act of 2014 (WIOA), which authorizes and funds employment and training programs in the United States. The LWDB's main role is to direct federal, state, and local funding to workforce development programs. Every community in Pennsylvania is associated with a LWDB. LWDBs develop workforce and regional strategies, as well as conduct and publish research on the needs of their regional economy. LWDBs also provide oversight and coordination of the workforce services provided in their region and the overall operation of the storefront delivery of these services at PA CareerLink® locations.

For each LWDB, a chief elected official (a county commissioner or the mayor of a major city) appoints members to sit on the LWDB. These appointed positions are unpaid. A majority of a LWDB's membership must come from private businesses. There are also designated seats for representatives of labor and educational institutions, such as community colleges

Partnerships for regional economic performance, or PREP, is the Pennsylvania Department of Community and Economic Development's, or DCED, designated ten (10) regions designed for the purpose of long-term strategic economic development planning and investment throughout the commonwealth.

Pennsylvania CareerLink®/PA CareerLink® is the registered trademarked name of Pennsylvania's one-stop workforce development service-delivery system, including each one-stop center and public-facing aspects of the online job matching system used by individuals, job seekers, employers, program partners and providers, training providers and other stakeholders.

Pennsylvania Department of Labor & Industry, or L&I, is legally designated by the governor to serve as the state workforce agency.

Regional plan is a four-year action plan to develop, align, and integrate service delivery strategies and resources among the multiple local workforce development areas in the planning region. Regions are identified by the state, according to the requirements of WIOA Sec. 106(a) and 20 CFR 679.510, in order to align workforce development activities and resources with larger regional economic development areas and available resources. The regional plan must be consistent with the vision and goals of the state plan.

Required and additional partners are the entities that administer required programs or activities as described in WIOA Sec. 121(b)(1)(B) and 20 CFR 678.400, or the additional programs as described in WIOA Sec. 121(b)(2)(B) and 20 CFR 678.410 in a local area. Required programs and activities are mandated to be made available in the PA CareerLink® delivery system while additional programs may be made available if approved by the CEO and the LWDB. All partners must enter into a MOU with the LWDB.

Workforce Innovation and Opportunity Act, or WIOA, superseded the Workforce Investment Act of 1998 (WIA) and amended the Adult Education and Family Literacy Act, the Wagner-Peyser Act and the Rehabilitation Act of 1973. To help businesses and job seekers meet their needs, the workforce system established under WIOA is integrated by design. WIOA envisioned connecting businesses with job seekers, through meaningful partnerships among workforce, education, human services and economic development entities ensuring optimum results and

resource leveraging. The law addresses job seekers' needs by establishing a workforce system delivering access to employment, education, training and support services to succeed in the labor market. Through the PA CareerLink® one-stop system, WIOA addresses employers' needs by connecting them with skilled workers able to compete in the global economy.

Procedures

Regional and Local Area Planning Overview

Regional and local area plans provide the framework in defining how a designated area's workforce development system will achieve the purposes of WIOA. Preparation, development and submission of both plans occur every four years with subsequent review and modification, if applicable, two years after the plan's respective effective date as detailed in WIOA sections 102(c)(3) and 108(a). 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 this policy, associated guidance and supporting documents. **The effective date of the PY 2021-2024 WIOA regional and local area plans is July 1, 2021.**

All regional and local area plan packages must be submitted electronically by a regionally designated single point of contact, or POC, to the Bureau of Workforce Development Administration's, or BWDA, Policy Coordination Services unit's resource account at RA-LI-BWDA-Policy@pa.gov. A copy of the email must be sent to all LWDB chairpersons and CEOs within a region or local area and contain the subject line "[Region Name] WIOA Regional Plan" by close of business on the deadline indicated in this policy.

Regional and local area plan packages will be reviewed upon receipt. BWDA will notify the submitting LWDB'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 LWDB Executive Director, CEO and LWDB Chair of the disposition of the plan and/or modification (approval/denial). Refer to the associated guidance for additional direction.

The submission deadline for the PY 2021-2024 WIOA plans is April 2, 2021.

Resources

Fillable templates and other supporting documents required to be attached to the WIOA Local Plan are found at the L&I website <https://www.dli.pa.gov/Businesses/Workforce-Development/Pages/Pennsylvania's-Workforce-System-Directives.aspx>, below the posting of this policy.

- WIOA Regional and Local Area Plan Guide
- Appendix A: Supporting Information and Planning References
- Appendix B: WIOA Regional Plan Instructions
- Appendix C: WIOA Local Area Plan Instructions
- Appendix D: WIOA Regional Plan template
- Appendix E: WIOA Local Area Plan template, including Attestations
- Appendix F: Epilogue
- Required Supporting Documents:
 - WIOA Plans Submission Checklist
 - Submission Cover Letter template
 - WIOA Plan Modification Forms
 - Attachment 1 - Local Area WIOA Title I Programs Performance Accountability template

- o Attachment 2- Local Workforce Development System Organizational Chart model
- o Attachment 3 - Local Workforce Development System Program Partner-Provider List template
- o Attachment 4 – Local Workforce Development System Supporting Data template

Supporting Information

Appendix A is a list of references used in the development of this policy and associated guidance which may provide additional information for implementation.

Policy History

WIOA sets parameters for state’s 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. As described in Pennsylvania’s *WIOA Combined State Plan*, 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 PA’s goals and transcend the fragmentation of workforce development programs.

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. A plan is only as effective as the partnerships that implement it. 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 help meet those needs and a shared agreement on the 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.

Summary of Changes

Revision Date	Author	Description
12/9/2020	L&I’s BWDA	Packaged for public comment.
10/27/20	L&I’s BWDA	Structure exception clarification was added to prompt L3.1 in Appendix C: Local Area Plans Instruction. Attestations were updated to reflect the local area plan effective date and to ensure Attestation components and documents, including local workforce system policies, are reviewed and revised as to be aligned with WIOA for the current planning cycle.
6/8/2020	L&I’s BWDA	Minor typographical and grammatical errors were corrected. The entire policy was reformatted; most content remained the same however was reorganized and separated into policy and guidance. Clarification was added in the policy, guide and modification forms that areas designated as <i>a single local area region</i> are excluded from submitting a regional plan. Former Appendices B and C were renamed to D and E. Former Appendices E, F and G were renamed to Attachments 1, 2 and 3. Attachment 4: <i>Supporting Data</i> template was added to reformat submitted local area plans. Supporting documents: <i>WIOA Plans Submission Checklist</i> and <i>Submission Cover Letter</i> template were added to provide LWDBs with additional direction and clarification. The WIOA Plan Modification Forms were revised to provide usage clarifications to LWDBs.

		Additional regional and local plan prompts were added due to internal stakeholders' requests, to clarify the change of plan submission requirements for <i>single local area regions</i> as detailed above, to incorporate the annual TANF plan narrative into local area plans, or to reflect changes to Pennsylvania's WIOA Combined State Plan.
6/4/2019	L&I's BWDA	<i>Summary of Changes</i> was added to reflect changes from the original policy. Section III (previously section VI), <i>Background</i> , indicated: Pennsylvania's PY 2020 – 2023 WIOA Combined State Plan information; the Governor's decision to offset PY 2020 - 2023 WIOA regional and local area plans by one year; and explanation of WIOA regional and local area plans modifications. Section IV (previously Section V), <i>Deadline</i> , was revised to include required WIOA modifications. Section V (previously Section VI), B. <i>Plan Components</i> , was revised. Section VII (previously Section VIII), A. <i>Regional Plans</i> and B. <i>Local Area Planning</i> , contained an added bullet: "At a minimum, review the regional (or local) plan two years after its effective date and submit a plan modification as described herein." Section XI (previously Section XII), <i>Plan Extension and Modification</i> , was enhanced. L&I's <i>WIOA Regional or Local Plans Modification Form</i> was updated and posted with the policy. Section VIII, <i>Public Comment Period</i> , was modified to include public notice requirements. Section IX, <i>Plan Submission and Approval</i> , added "Public Posting of Approved Plan".
5/17/2017	L&I's BWDA	Provided initial instruction and technical guidance regarding preparation, development, submission and approval of regional and local area plans.

Public Comment

The policy has not yet been posted for public comment.

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*, 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 PA’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 LWDAs, 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 LWDA. In Pennsylvania, there are five such regions: Central, Lehigh Valley, North Central, Northern Tier and Southern Alleghenies.

II. Planning.

A. Regional Planning (“Planning Regions” only).

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 board, their respective chief elected official(s), or CEO(s), as well as 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;
 - provides an opportunity for public comment consistent with Section III, *Public Comment Period*;
 - 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.

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 with 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;
 - provides an opportunity for public comment consistent with Section III, *Public Comment Period*; and
 - regularly makes public plan information available electronically and through open meetings.
- 3) Align with the regional plan (see *Appendix B: Regional Plan Instructions*) and be submitted as a regional plan component. This applies to wherever a local area is designated as part of a "Planning Region".
 - 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 associated regional plan if applicable, must be posted on the submitting LWDB'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.

IV. **Plan Submission Requirements and Approval.**

A. **Plan Submission Requirements.** Prior to submission, the local workforce development boards, or LWDBs, must:

- Provide a *Submission Cover Letter*. Use letterhead from the submitting LWDB 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 LWDB engagement; 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 LWDB chair member and the full Local Board reviewed and agreed with the submitted plan. The letter is signed and dated by the submitting LWDB's Chair and the respective LWDA's CEO.
- Provide an electronic copy (in Microsoft Word) of the plan and all supporting documents (either in Microsoft Word or PDF). Each local area plan(s), 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 "strikeout" feature for narrative meant to be deleted; use the "yellow highlight" feature for new narrative or if the narrative context changes due to edits.
- Provide documentation showing that the submitting LWDB 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 LWDA(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 LWDB'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 LWDB'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. Plan(s) submitted to L&I are considered approved if:

- L&I provides notification of approval to local area CEO and LWDB Chairperson; or
- At least 90 days have passed since the submission of the draft plan without the submitting LWDB 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;
- The plan does not include local area plan submissions from the local board(s) within the 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 plans and supplemental plan information (i.e. local area's WIOA Title I Performance Measures, Local Workforce System Organizational Chart, Partner-Provider List template and Supporting Data template) on the local board's website. It is noted that supplemental plan information will not require plan modification approval as it is expected the local board will make timely revisions to the supplemental plan information. The submitting LWDB must post on their website the approved plan and all supporting documents: L&I Approval Letter; Submission Cover Letter; WIOA Plan and any supplemental pages; WIOA Plan Modification Forms (*when applicable*); proof of legal public notice of the plan's public posting; public comments received and the LWDB's comment acknowledgements.

V. Structure Exceptions. Consistent with Workforce System Policy (WSP) No. 02-2015, *Local Governance*, Dec. 18, 2015, 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.*

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:

- o significant changes in local economic conditions;
- o changes in the financing available to support WIOA Title I and partner-provided WIOA services;
- o changes to the Local Workforce Development Board structure; and
- o 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.

Regional and Local Area Plans

Appendix A: Supporting Information and Planning References

I. **Supporting Information.** Each is hyperlinked for easy access:

- [Public Law \(Pub. L.\) 113-128, Workforce Innovation and Opportunity Act \(WIOA\)](#)
- [20 Code of Federal Regulations \(CFR\), WIOA Final Rules and Regulations](#)
- [29 CFR Part 97, Monitoring and Reporting Program Performance](#)
- [2 CFR Part 200 et al, and Part 2900, Office of Management and Budget \(OMB\) Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards](#)
- [U.S. Department of Labor Employment and Training Administration \(ETA\) Training and Employment Guidance Letter \(TEGL\) No. 37-14, Update on Complying with Nondiscrimination Requirements: Discrimination Based on Gender Identity, Gender Expression and Sex Stereotyping Are Prohibited Forms of Sex Discrimination in the Workforce Development System](#)
- [TEGL No. 13-16, Guidance on Registered Apprenticeship Provisions and Opportunities in the Workforce Innovation and Opportunity Act \(WIOA\)](#)
- [TEGL No. 10-19, Technical Assistance regarding the Submission Deadline for the Unified and Combined State Plans under the Workforce Innovation and Opportunity Act \(WIOA\) for Program Years \(PYs\) 2020-2023 and Other related Requirements](#)
- [U.S. Department of Labor Employment and Training Administration \(ETA\) Training and Employment Notice \(TEN\) No. 1-15, Promising Practices in Achieving Universal Access and Equal Opportunity: A Section 188 Disability Reference Guide](#)
- [Pennsylvania WIOA PY 2021 – PY 2024 Combined State Plan](#)
- [Pennsylvania Workforce System Directives](#)

II. **Planning References.** Each is hyperlinked for easy access:

- [Pennsylvania Workforce Development Board \(PA WDB\) information](#)
- [Center for Workforce Information and Analysis, or CWIA](#), presents a wide range of data and information on their website and is available to provide technical assistance regarding planning questions that necessitate labor market and economic information analysis.
- [The Americans with Disabilities Act \(ADA\)](#)
- [Workforce System Policy \(WSP\) No. 02-2015, Local Governance, December 18, 2015](#)

Appendix B: Regional Plan Instructions

WIOA requires a broad strategic approach to planning focused on the overarching vision, goals, alignment and shared responsibilities within a designated region. *Planning regions* are required to provide a regional plan that incorporates each prompt listed in this appendix.

Regional plans are broader in scope than the plan developed for the respective local area(s) within a planning region. Regional plan drafters are encouraged to include data samples, streamlined graphics and tables to support any narrative instead of large volumes of data, tables and graphs.

The Pennsylvania Department of Labor & Industry, or L&I, includes a sub-section labeled “*Expectation*” for most prompts. This sub-section provides planners with practical concepts for developing narrative and creating a basis for discussion. Concepts are not all-inclusive but provide a foundation for building narrative. L&I will use each prompt’s general contextual meaning and *expectation* to evaluate narrative when reviewing each submitted regional plan.

Note: The local board must cite the source(s) used to collect all or part of the regional labor market data (e.g. Center for Workforce Information and Analysis, or CWIA).

1.1. Identification of the region.

Factors being considered include, but are not limited to:

- A reference name for the region;
- Identification of the LWDA(s) that comprise the region;
- Identification of the key region committee members charged with drafting the regional plan to include organizational affiliation;
- A list of key region committee meeting dates; and
- The regional plan’s effective date.

1.2. Based on the analysis of the regional labor market and economic conditions, describe the region’s workforce and economic development-oriented vision and goals. [WIOA Sec. 106(c)(1)(D); 20 CFR 679.510(a)(1)(vii)]

Expectation: The narrative must include a description of the region’s vision and a set of goals that are cognizant of the regional economic conditions labor market data and are in alignment with the state plan.

Factors being considered include, but are not limited to:

- How the strategic goals consider both workforce and economic development priorities within the region;
- How the local board will expand the use of apprenticeships as part of the local board’s business/employer engagement strategy;
- How the local board will demonstrate Engage! linkage between workforce and economic development throughout the LWDA;
- How the local board will work with local economic development organizations to achieve the strategic goals; and
- How the coordination of services with regional economic development services and providers will occur.

1.3. Describe the collection and analysis of regional labor market data (in conjunction with the Commonwealth). [WIOA Sec. 106(c)(1)(D); 20 CFR 679.510(a)(1)(iv); 20 CFR 679.560(a)(1)(i) and (ii)]

Expectation: Regional planner(s) must describe and analyze regional labor market data to articulate the region’s economic conditions and employers’ employment needs.

Factors being considered include, but are not limited to:

- Describing the state of the regional economy and key positive and negative economic conditions (e.g., on-going business cycle impact, business community vitality, unemployment trends; demographic information; key legal-political-social conditions; technological changes; natural forces);
- Identifying key industry cluster(s);
- Identifying existing and emerging in-demand industry sector(s);
- Identifying existing and emerging in-demand industry sector(s) occupations;
- Providing data describing the location quotients (LQ) of the region and local area(s); and

Appendix B: Regional Plan Instructions

- Describing the employment needs of employers in existing and emerging in-demand industry sectors and occupations.

The regional area may support the narrative by:

- Additional narrative may include similarities and differences of associated local areas: specifically, the economic conditions and competitive strengths and weaknesses of business market factors found in each local area.

1.4. Describe the regional service strategies aimed at achieving the vision and goals established for the region. [WIOA Sec. 106(c)(1)(B); 20 CFR 679.510(a)(1)(iii)]

Factors being considered include, but are not limited to:

- Broad-based, overarching sector and industry strategies, including an apprenticeship strategy;
- Coordination of services with regional economic development services and providers in the region;
- Any cooperative service delivery agreements that have been established for the region;
- How the region will connect targeted populations, especially youth and individuals with barriers to employment, to career services and training activities offered on a regional level, such as YouthBuild, Job Corps and AmeriCorps programs. Data measuring the number of youth, and specifically opportunity youth, enrolled in these programs must be provided to support the narrative, as appropriate;
- How will regional business service strategies be employed, as well as, how coordination of these strategies will impact the operational level of services (i.e. local area Business Service Teams, or BST); and
- How the region will coordinate with secondary and post-secondary institutions (including programs authorized by the Perkins V Act) to align strategies, enhance services and avoid duplication of services (include specific reference to adult education, community colleges and community education councils).

1.5. Describe the development and implementation of sector initiatives for in-demand industry sectors or occupations for the region. [WIOA Sec. 106(c)(1)(C); 20 CFR 679.510(a)(1)(iii)]

Expectation: The narrative response must capture any sector or industry initiatives, partnerships, next-generation sector partnerships and any other sector-based initiatives that support all or part of the region (including economic development partners).

Factors being considered include, but are not limited to:

- The identity and description of key sector or industry initiatives, partnerships, next-generation sector partnerships and any other sector-based initiatives that support all or part of the region;
- An explanation why the region targeted select sectors, partnerships and other initiatives; and
- A description of, and reasoning for, the current in-demand occupation(s) that are expected to change status as well as occupations that may change to become an in-demand occupation.

1.6. Describe how the region will connect employer labor force requirements and occupational demands with the region's labor force, including individuals with barriers to employment.

Expectation: Regional plans must incorporate strategies that reflect local leaders and boards considering how to optimize the available opportunities and minimize the structural weakness presented by the current workforce system environment for the betterment of regional employers and the labor force.

The regional area may support the narrative by:

- Including how the region will connect targeted populations, especially youth and individuals with barriers to employment, to in-demand occupations;
- Including descriptions of when leaders, board members and stakeholders met and any subjects or resolutions that came to fruition; and
- Including summaries of any number of reports commissioned to research and determine recommended actions that are of concern to the local and regional workforce system leaders and stakeholders; examples include studies that indicate strategies and tactics that will increase the ability of employers to attract, hire and maintain regional labor force participants in gainful employment, or evaluations of best practices for serving the various classes of individuals with barriers to employment.

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Note: While it is important that the drafters understand the data and connect the labor force requirements with occupational demands, it is also important to connect with actual employers who will verify that need.

- 1.7. Describe the coordination of transportation and other supportive services for the region.** [WIOA Sec. 106(c)(1)(F); 20 CFR 679.510(a)(1)(vi)]

Expectation 1: The region must describe the role transportation plays in the relationship of the labor force and employment opportunities, display the commuting data such as inflow and outflow and other patterns, articulate available transportation modes' strengths and weaknesses, and indicate how the region may help bridge the transportation gap between labor force and employment locations. Describe transportation availability for workforce members who are unable to benefit from personal transportation.

Expectation 2: The region must describe any regional and inter-governmental agreements that allows the coordination of identified regionwide supportive services and resources in such a manner as to permit customers to participate.

- 1.8. Describe the region's strategy to increase participation on the statewide eligible training provider list.**

Expectation: Regional plans must articulate strategies to grow in number and improve the overall quality of eligible training provider participation in the statewide eligible training provider list.

- 1.9. Describe how the region established administrative cost arrangements, including the pooling of funds for administrative costs, as appropriate, for the region.** [WIOA Sec. 106(c)(1)(E); 20 CFR 679.510(a)(1)(v).]

Expectation: This narrative must provide a description of the regional activities (e.g., regional planning), how such activities were determined and what funds will be used to pay for those activities. The narrative must include the entity that will serve as the fiscal agent. Finally, the description must include how such regional cost arrangements will be handled for the region, including administrative costs, as appropriate.

- 1.10. Describe the agreement between the local boards that describes how the planning region will collectively negotiate and reach agreement with L&I on local levels of performance for, and report on, the performance accountability measures described in section 116(c), for each of the local areas within the planning region.** [WIOA Sec. 106(c)(1)(H); 20 CFR 679.510(a)(1)(viii)]

Expectation: WIOA sec. 107(d)(9) requires that local areas negotiate performance and 20 CFR § 679.510(a)(1)(viii) requires an agreement between local boards and chief elected officials for how a planning region will collectively negotiate and reach agreement with the governor on local levels of performance for, and report on, the performance accountability measures as required by WIOA sec. 116(c)(1)(H) and §679.510(a)(1)(viii). The representatives of each local area in a planning region are collectively responsible for the process. The narrative in the local area plan must provide a description similar to the agreement reached between the local boards and chief elected officials. The answer may simply be that each local area will negotiate individually with the state.

Appendix C: Local Area Plan Instructions

Local area plans serve as a four-year action plan to develop, align and integrate service delivery strategies to support Pennsylvania’s vision, strategic and operational goals within local workforce development areas as well as the regional goals and strategies (as appropriate).

Local area plans set forth the strategy to:

- Direct investments in educational and training programs to ensure that individuals, including youth and individuals with barriers to employment, have the skills to compete in the job market and that employers have a ready supply of skilled workers;
- Apply demand-driven strategies in the one-stop delivery system;
- Enable economic, education and workforce partners to build a skilled workforce through innovation in, and alignment of, employment, training and education programs; and

These requirements set the foundation for WIOA principles by fostering strategic alignment, improving service integration and ensuring that the public workforce system is industry-relevant, responding to the local area’s economic needs and matching skilled workers with employers.

Single local areas and *planning regions* are required to provide a local area plan that incorporates each prompt listed in this appendix. **Note:** In *planning regions*, there may be narrative duplication between the regional plan and the local area plan. Specific notes will indicate the proper action to follow.

The Pennsylvania Department of Labor & Industry, or L&I, includes a sub-section labeled “*Expectation*” for most prompts. This sub-section provides planners with practical concepts for developing narrative and creating a basis for discussion. Concepts are not all-inclusive but provide a foundation for building narrative. L&I will use each prompt’s general contextual meaning and *expectation* to evaluate narrative when reviewing each submitted local area plan.

Local Area Plan Contents:

Introduction

Strategic Planning

Section 1: Local Area Workforce and Economic Analysis

Section 2: Vision and Goals

Operational Planning

Section 3: Local Workforce Development System and Investment Strategies

Section 4: Local Workforce Delivery System

Compliance

Section 5: Compliance and Attestations

Appendix C: Local Area Plan Instructions

INTRODUCTION

Local areas have the option to summarize why and how the local area plan is created with hopes of expanding potential reader engagement. The introduction may include but is not limited to a summary of the strategic planning process, timeline and outcomes; or the purpose, design and how the local workforce development board, or LWDB, will use local area plan findings.

Note: Generic references to WIOA local area plan requirements already discussed thoroughly within the local area plan's designated sections are permitted.

1. STRATEGIC PLANNING: Local Area Workforce and Economic Analysis

Prompts in this section are designed to address aspects of the local area's labor force including composition and determination of skill gaps between the talent needed by employers in the region and the knowledge and skills held by workers and job seekers. One prompt addresses workforce development activity necessary to bridge the identified regional skill gaps.

Local boards may provide a comparative analysis describing similarities and differences between any of the regional plan narrative and what is (or may be) occurring in the local area.

Note 1: It is recommended that these plans include data samples, streamlined graphics and tables that support narrative provided instead of large volumes of data, tables and graphs. When documenting various data methodologies, drafters are also encouraged to reference the data location in the plan narrative and move data samples, streamlined graphics and tables to *Attachment 4: Local Workforce Development System Supporting Data*.

Note 2: The local board must cite the source(s) that are used to collect all or part of the regional labor market data (e.g., Center for Workforce Information and Analysis, or CWIA).

1.1. Identify the composition of the local area's population and labor force. [20 CFR § 679.560(a)(3)]

Expectation: Narrative must include a reference name for the region and the local area plan's effective date. Narrative must focus on characteristics about the region's population such as age distribution, educational attainment levels, individuals with barriers to employment (based upon WIOA Sec 3(24)) and employment status. This section must also focus on trends in each of these areas. Explain why some of these groups are harder or easier to serve. Data must be provided to support narrative as appropriate.

Note: When documenting various data methodologies, reference the location of graphics and/or tables as detailed in *Attachment 4: Local Workforce Development System Supporting Data* in prompt narrative.

1.2. How are skills gaps defined in the local area? Provide a description of the skills that are required to meet the needs of employers in region and local area? [20 CFR 679.560(a)(2)]

Expectation: Narrative is not expected to be data-heavy and must focus more on policy, best practices and knowledge of workforce. Narrative must explain how the local area identifies skills gaps that exist between regional employers' needs and the existing local area workforce qualifications. Narrative must highlight specific local examples of these gaps such as a workforce with insufficient and outdated skills, a workforce with skills that exceed job demand, a lack of training programs for needed skills and other factors unique to your local area.

The local area may support the narrative by:

- Focusing on the specific talent (knowledge and skills) believed to be needed by employers in the local area region;
- Speaking to employability skills, as well as hard skills—consider the focus on serving individuals with a barrier (or multiple barriers) to employment; and
- Identifying the certifications, degrees or fields of study most in-demand in the local area.

1.3. What are the challenges the local area face in aligning existing labor force skills and education and training activities with the needs of regional employers?

Expectation: Local area plans must incorporate strategies that reflect local leaders and boards considering how to optimize the available opportunities and minimize the structural weakness presented by the current workforce system environment for the betterment of regional employers and the labor force. Narrative must also include incumbent worker training and how the local workforce delivery system will work with regional employers to fill the entry-level positions created by upskilling incumbent workers.

The local area may support the narrative by:

- Including descriptions of when leaders, board members and stakeholders met and any subjects or resolutions that came to fruition; and

Appendix C: Local Area Plan Instructions

- Summarizing any number of reports commissioned to research and determine recommended actions that are of concern to local area and regional workforce system leaders and stakeholders. Examples include studies indicating strategies and tactics that will increase employers' ability to attract, hire and maintain regional and local area labor force participants in gainful employment, or evaluating best practices for serving individuals with barriers to employment.

Note: While it is important that the drafters understand the data and connect the labor force requirements with occupational demands, it is also important to connect with actual employers who will verify that need.

1.4. Provide an analysis of local area workforce development activities, including education and training. [679.560(a)(4)]

Expectation: Narrative must present an analysis that includes the strengths and weaknesses of workforce development activities including education and training activities; the workforce system's capacity to provide activities necessary to address the workforce's education and skill needs, including individuals with barriers to employment and employers' needs; and how apprenticeship programs can be leveraged to address these needs when it comes to individuals with barriers to employment, individuals in underserved communities, diversity of individuals and employers' needs.

1.5. Describe strategic planning elements including a regional analysis of economic conditions. [20 CFR 679.560(a)(1)(i) and (ii)]

Expectation: Narrative must describe and analyze regional labor market data to articulate the region's economic conditions and employers' employment needs.

Factors being considered include, but are not limited to:

- Identifying existing and emerging in-demand industry sector(s);
- Identifying existing and emerging in-demand industry sector(s) occupations;
- Providing data describing the location quotients (LQ) of the local area(s); and
- Describing employers' employment needs in existing and emerging in-demand industry sectors and occupations.

Note: *Planning Regions* may reference and summarize similar narrative originally provided in Appendix B: *Regional Plan Instructions*, prompt 1.3.

2. STRATEGIC PLANNING: Vision and Goals

Consider the local area analysis developed in Section 1, *Local Area Workforce and Economic Analysis*, the goals established by the governor as outlined in the state plan and the goals established regionally. Each local area plan will provide narrative to the prompts outlined in this section. Responses will identify the local area's strategic vision and goals created by chief elected officials, the local board and the local workforce system stakeholders.

Note: If a local board is part of a *planning region*, responses will identify the local area's strategic vision and goals in support of the planning region.

2.1. What are the local board's strategic vision and goals for preparing its workforce? [WIOA Sec. 108(b)(1)(E); 20 CFR § 679.560(a)(5)]

Factors being considered include, but are not limited to:

- Local board's strategic vision;
- Local areas associated with *Planning Regions* must also consider their respective regional plan goals and strategies, list appropriate goals and strategies to maintain alignment; and
- Identifying any additional local board goals and strategies.

2.2. What is the local board's strategy to work with the entities that carry out the core programs to align resources available to the local area, in order to achieve the strategic vision and goals for the local area? [WIOA Sec. 108(b)(1)(F); 20 CFR § 679.560(a)(6)]

Expectation: Considering the local board's responses to prompts at Section 1, *Regional Workforce and Economic Analysis*, the narrative will describe the *strategy* developed by the local board to carry out the core programs and the programs of required and additional partners. Narrative will address how this strategy assists in aligning all available resources to achieve the local area's strategic vision and goals.

2.3. How will the local board's vision and goals align with, support and contribute to the governor's vision and goals for the state's workforce development system, as well as any of the goals and strategies articulated in the regional plan? [WIOA Sec. 108(b)(2); 20 CFR § 679.560(b)(1)(ii)]

Expectation: Narrative must indicate that the local board adopted the governor's vision and all goals as articulated in the WIOA Combined State Plan; it is expected that local board's goals and strategies are reasonably aligned with the WIOA Combined State Plan, as well as any appropriate regional plan goals and strategies (*wherever the local area is part of a planning region*).

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Factors being considered include, but are not limited to:

- How the local area will connect adults, dislocated workers and other targeted populations, especially youth and individuals with barriers to employment, to in-demand occupations;
- How the skill gaps (addressed in the narrative to prompt 1.2 above) will be eliminated or narrowed;
- How the local board will target services efficiently to educate and increase its workforce's knowledge and skill sets;
- How the local board will develop and implement a comprehensive Career Pathways plan (including both employment and education components, as well as adult education) throughout the local area;
- How the local area will coordinate with secondary and post-secondary institutions (including programs authorized by the Perkins V Act) to align strategies, enhance services and avoid duplication of services (including specific reference to adult education, community colleges and community education councils);
- How the system will improve access to services and to activities that lead to a recognized postsecondary credential;
- How the local area will expand upon work-based training goals and strategies such as transitional jobs and leveraging existing apprenticeship programs or working with employers in the local area to develop new programs;
- How will local area business service strategies be employed (i.e. Business Service Teams, or BST); and
- How the goals support economic growth and economic self-sufficiency for the local area.

2.4. What are the local levels of performance that have been negotiated with the governor and chief elected officials? [WIOA 116(c); 20 CFR § 679.560(b)(16)]

How will the local board's goals relate to the achievement of these measures? [WIOA Sec. 108(b)(17); 20 CFR § 679.560(b)(5)]

Expectation 1: Local area plans must reference and include a completed WIOA Title I performance measures table found within the fillable template (i.e. Attachment 1: *Local Area WIOA Title I Programs Performance Accountability template*). This table incorporates the local levels of WIOA negotiated performance goals and the previous year attained performance measures.

Expectation 2: Narrative must describe how the local board's goals will assist in achieving the negotiated performance levels, and to what extent the local board's goals are impacted by such levels. Narrative must address how performance levels are used to measure local area performance.

3. OPERATIONAL PLANNING: Local Area Workforce System and Investment Strategies

The following responses will expand on the previous section's visions and goals including how the local board designs strategies to reach those goals.

Note: If a local board is part of a *planning region*, responses will identify the local area's strategic vision and goals in support of the planning region.

3.1. Provide a descriptive overview of the governance structure for the workforce system, including key stakeholders and entities in the local area.

Expectation 1: Narrative must include a description of how local elected officials, advocacy groups, LWDB, and other key stakeholders interact within the local workforce system. This description must include the respective roles and functional relationships of the following entities, as well as other entities, that compose the local workforce system.

Factors being considered include, but are not limited to Governance and Administrative functions:

- The local elected officials in the governance of the local workforce system (i.e., local board), as well as the day to day operations of the local workforce delivery system;
- The identity and role of the entity responsible for the disbursement of grant funds (i.e., fiscal agent entity) as determined by the chief elected official(s);
- The role of the LWDB as the governing body responsible for the governance, strategic planning, fiscal and oversight of the local workforce system;
- Include a listing of each committee of the board (executive committee, if applicable, and each standing committee (required and ad hoc)). Provide a brief description of the function of each committee;
- The identity and role of the entity responsible for providing staff to the local board (i.e., administrative entity); and
- The identity and role of the individual(s) responsible for ensuring equal employment opportunities and civil right protections.

Appendix C: Local Area Plan Instructions

Expectation 2: Each local board must reference and include a completed organizational chart depicting a clear separation of duties between the local board and programmatic and service delivery entities (i.e. Attachment 2: *Local Workforce Development System Organizational Chart model*).

Structure Exceptions Note: Consistent with Workforce System Policy (WSP) No. 02-2015, *Local Governance Policy*, Dec. 18, 2015, Section VI.F., *Restrictions*, in cases where career and training services are provided by an interrelated agency (i.e., county agency, commission structure or corporation) that is also the employer of the LWDB staff and fiscal agent staff, the service and training provider staff must report to a supervisor that does not oversee local board or fiscal agent staff. L&I has determined that any one of the interrelated agencies listed above must have separate departments to ensure a clear separation between governance and the day-to-day operations, and that each department head must report to a different local elected official. This structure is only allowable through written approval by the department.

If the local area has an approved structural exemption, the chief elected official(s), in collaboration with the local board, must reference the approved structure exemption and address any structural issues in this section of the local area plan. The narrative must articulate that when career and training services are provided by an interrelated agency that is also the employer of the local board staff and fiscal agent staff, that separate departments, internal controls and appropriate supervision for each department is in place.

3.2. What are the programs included in the local workforce delivery system and how will the local board work with the entities carrying out all workforce programs to support service alignment? [20 CFR § 679.560(b)(1)]

Factors being considered include, but are not limited to:

- Describe each local area workforce system's required and additional partner programs by referencing and including the completed program partner-provider list template (i.e. Attachment 3: *Local Workforce Development System Program Partner-Provider List*). This list identifies the programs, the program provider(s) and where in the local area the programs may be accessed;
- How will the local board collaborate with each required and additional partner in the PA CareerLink® service delivery system promoting service alignment; and
- How will alignment of such programs support the strategy identified in the state plan, the regional plan (if applicable) and the local area's strategies?

3.3. How will the local board work with the entities carrying out core programs to: [20 CFR § 679.560(b)(2)]

- Expand access to employment, training, education and supportive services for eligible individuals, particularly individuals with barriers to employment.
- Facilitate the development of Career Pathways and co-enrollment, as appropriate, in core programs (specify on-ramps from adult education).

Factors being considered include, but are not limited to:

- Describing the local board's methods of validating the eligibility of individuals, including the use of telephone verification and documentation inspection verification, especially in consideration of individuals with barriers to employment;
- Outlining the steps staff will take to verify eligibility prior to self-certification;
- Describing strategies and operational elements established to ensure that participant "co-enrollment" across relevant programs is practiced;
- Describing strategies and operational elements established to increase awareness and access to WIOA title II programs;
- Describing strategies and operational elements established to increase awareness and access to the WIOA title IV programs, and that operational compliance concerns are addressed (e.g. qualified Office of Vocational Rehabilitation, or OVR, counselors determine eligibility for services);
- Describing efforts to identify and improve access to activities leading to a recognized postsecondary credential; and
- Describing operational elements the local board has developed to address the systemic process created to develop and promote Career Pathways.

3.4. What strategies will be implemented in the local area to improve business and employer engagement that: [20 CFR § 679.560(b)(3)]

- Support a local area workforce development system that meets the needs of businesses in the local area;
- Manage activities or services that will be implemented to improve business engagement;
- Better coordinate regional workforce and economic development strategy, messaging, engagement and programs; and
- Strengthen linkages between the PA CareerLink® service delivery system and unemployment insurance (UI) programs.

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Factors being considered include, but are not limited to:

- Describing the local board’s strategies and key operational elements that frame the following initiatives:
 - work-based training opportunities, including but not limited to: incumbent worker training programs, on-the-job training, or OJT, programs, customized training programs and the use of apprenticeship models to support these programs;
 - industry and sector strategies;
 - career lattices and pathways initiatives (including how they are connected to adult education);
 - expanding apprenticeship models to include development of pre-apprenticeship programs to serve as a feeder to existing registered apprenticeship programs or in concert with development of new registered apprenticeship programs;
 - utilization of effective business intermediaries; and
 - other business services and strategies designed to meet the needs of regional employers.
- Describing who facilitates employer engagement in workforce development programs, including small employers and employers operating within in-demand industry sectors and occupations;
- How will the local board engage employers within in-demand industries and ensure that the employment and training activities in the local area meet the needs of its employers;
- Describing entity(s) tasked with the management and administrative roles of the business engagement services function (which includes employer case management, tracking of services and data research and analysis) as well as tracking which entities are making employer visits and the collaboration that occurs during these visits;
- Describing the roles and responsibilities of local board staff hired and contracted entities primarily tasked with business engagement related activities and services;
- How will the local board continue to develop appropriate ways to measure and benchmark employer outcome results;
- How will the local board improve key economic development partner relationships;
- How are programs and services being adopted by businesses and employers;
- If the local area has Industry Partnerships, how will the partnership employers influence not only the industry partnership training, but also that of the entire area;
- How will the local board improve strategies and practices to increase business and employer engagement over current levels;
- How will the local board better coordinate regional workforce and economic development strategy;
- If the local area has the Engage! Program, how will Engage! further strengthen the relationship between workforce and economic development; and
- With the knowledge that Unemployment Compensation (UC) representatives are not available to be deployed in the PA CareerLink® sites and only UC courtesy phones and PC’s are provided, describe the local board’s strategies and operational elements it utilizes to support unemployment insurance programs and resources employed for the benefit of local area businesses and citizens:
 - Describe how UC claimants are provided reemployment services, including a brief overview of how the local board manages the “Reemployment Services and Eligibility Assessment” (RESEA) program;
 - Describe how the local board supports UC claimants, indicating they are complying with Pennsylvania’s UC law “Register for Work and Work Search”; and
 - Indicate how the local board identifies and refers to UC for adjudication, listing any potential UC eligibility issues identified during RESEA or any other UC claimant interaction.

Note: Narrative may contain other strategies the local board employs to expand employment and career advancement opportunities for workforce development system participants within in-demand industries or sectors. Narrative may also describe the local board’s plan to leverage unemployment insurance resources including but not limited to: collaboration with UC regarding quarterly Employer UC Presentations, requesting UC assistance in promoting Employer UC Presentations as necessary and using UC as a resource for Employer contact when applicable.

3.5. How will the local board coordinate local area workforce investment activities with regional economic development activities that are specific to a local area? How will the local board promote entrepreneurial skills training and microenterprise services? [20 CFR § 679.560(b)(4)]

Factors being considered include, but are not limited to:

- How will the local board strategically coordinate with regional economic development and employer partners in the local area to identify and fulfill industry needs;

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- Describing regional and local area DCED supported activities (e.g. Small Business Development Centers, or SBDCs, which are PREP agencies) that collaborate with interested entities;
- Describing what resources the local board will use to promote entrepreneurial skills training and microenterprise services;
- How is the local board measuring employer outcome results; and
- How will the local board support and promote a training strategy that leads to self-employment? How might this strategy be used to help individuals or participants with barriers to employment (e.g., persons with disabilities and ex-offenders)?

Note: Alignment between the public workforce system and local economic development activities (e.g. Engage! or PREP) is critical in order to identify and fulfill industry talent needs by training customers for emerging and in-demand job skills. Furthermore, microenterprise development refers to training for the purposes of self-employment. This training strategy may be appropriate for individuals or participants with barriers to employment, including persons with disabilities. *WIOA Final Rules, Preamble pg. 56108, first column.*

4. OPERATIONAL PLANNING: Local Area Workforce Delivery System

Prompts in this section require greater detail and must focus on how the local board will execute the strategies in section 3. The responses in this section must be more explicit: expanding on the roles of all partners, including examples of specific employment and training activities, as well as specific employer engagement methods.

4.1. Provide a descriptive overview of the local area workforce delivery system, including key stakeholders and entities in the local area.

Expectation: Narrative must include a description of how local elected officials, advocacy groups, the LWDB, required and additional partners and other key stakeholders interact within the local area workforce service delivery system. This description must include the respective roles and functional relationships of the following entities, as well as other entities, that compose the local workforce service delivery system.

Factors being considered include, but are not limited to Programmatic functions:

- The identity and key role(s) of the PA CareerLink® operator(s) in the local area. Include a summary of the competitive process used (or will be used) to procure such entity;
- The entity or entities identified to provide WIOA title I programs and activities in the local area. Include a summary of the competitive process used (or will be used) to award the subgrants and contracts;
- The entity or entities that provide WIOA title II, Adult Education and Literacy programs and activities in the local area;
- The entity or entities that provide WIOA title III, Wagner-Peyser programs and activities in the local area;
- The entity or entities that provide WIOA title IV, Vocational Rehabilitation programs and activities in the local area;
- The identity and role of the individual(s) responsible for ensuring equal employment opportunities and civil right protections;
- Advocacy groups in the local area; and
- Other key stakeholders that compose the local area workforce delivery system network.

4.2. Identify the one-stop partners (required and other) authorized to provide required and other programs within the local area. Describe briefly the role(s) of the one-stop partners (required and other). [20 CFR § 679.560(b)(5)(iv)]

Expectation 1: Narrative must list each of the one-stop partners, as well as describe their roles and the resource contributions to the local area workforce delivery system. Examples of resource contributions may include but are not limited to in-kind and programmatic contributions.

Expectation 2: Local boards are required to reference and include the completed program partner-provider list (i.e. Attachment 3: *Local Workforce Development System Program Partner-Provider List*). This list identifies comprehensive and affiliate PA CareerLink® sites, specialized centers and the programs available at each.

4.3. How will the local board facilitate access to services provided through the one-stop service delivery system? [20 CFR § 679.560(b)(5)(ii)]

Expectation: The narrative must explain how the local board plans to facilitate access to services provided through the one-stop service delivery system, with evidence of efforts to expand access regarding the provision of employment, training, education and supportive services for eligible individuals, particularly concerning individuals with barriers. Consideration must be given to ways that technology, transportation and information sharing help expedite service access to customers, especially to remote and rural

Appendix C: Local Area Plan Instructions

areas, target populations and individuals with disabilities. Available training programs and outreach activities must be described regarding services that partner agencies provide, and how to access such services.

The narrative must describe specifically how the local board facilitates service access with a consideration of the following:

- Plans to leverage resources and expand capacity within the local area workforce delivery system;
- Facilitates access to services provided through the one-stop delivery system (including facilitating access in remote areas);
- Describes efforts to provide quality services to remote and rural areas using technology and other means;
- In conjunction with a WIOA participant's interaction with the one stop delivery system, and program case managers in particular, describes how and when participant or employer information is entered into the state's system of record (i.e. CWDS). If a program case manager does not enter some or all the participant and employer information, describe who enters the information. Describe when the participant or employer information is entered into the state's system of record (i.e. CWDS) in relation to the time services were actually performed;
- Describes other state-owned case management information system(s) employed in the local area that WIOA participants' information is entered and stored (examples include, but are not limited to Unemployment Insurance, Adult Education and OVR). The local area must indicate the program partner that is the responsible entity that uses the case management information system;
- Describes the process that identifies participants not provided with WIOA title I and Title III career and training services but are enrolled in other WIOA programs. Describe how and when these WIOA participants' services and activities are entered into the CWDS;
- Lists non-Commonwealth owned and leased information management system(s) employed in the local area to aid in the management of WIOA programs (include information management system(s) used by contracted service providers). If such system(s) is used, describe the process the local area uses to align the WIOA participant information entered into the local area's additional non-Commonwealth owned and leased case management information system(s) with CWDS. The local board must provide a rationalization for why this data alignment process with CWDS is an optimum utilization of time, effort and funds;
- Participates in the development of Career Pathways that provide access to employment and training for individuals in adult education programs;
- Utilizes partners' program information sharing in ways that stress the importance of getting the information to customers quickly, as well as ensuring that communication is accessible;
- Identifies strategies for better meeting the needs of individuals with barriers to employment (such as improving digital literacy skills); and
- Ensures access to services, i.e., interpreters and translated documents, for English language learners, as well as for persons who are deaf or hard of hearing.

Note: Off-site program partner service locations may provide access to career services.

4.4. How will entities within the one-stop service delivery system, including one-stop operators and the one-stop partners, comply with WIOA Sec. 188 (as applicable) and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101, et seq.) regarding the physical and programmatic accessibility of facilities, programs and services, technology and materials for individuals with disabilities? [20 CFR § 679.560(b)(5)(iii)]

Expectation: The narrative must indicate how compliance with WIOA section 188, including the civil rights and equal opportunities, and applicable provisions of the Americans with Disabilities Act of 1990 will be assured for those that avail themselves to the services and resources (and that resources are at an appropriate reading level for the general population) of the local area one-stop delivery system (including regional designated services locations and 'mobile' one-stops).

Factors being considered include, but are not limited to:

- Listing key technology and materials available for individuals with disabilities to use at the one-stop;
- Describing operational support for addressing the needs of individuals with disabilities;
- Describing the efforts to address the needs of Individuals with limited English proficiency, or LEP;
- If applicable, describing program partner(s), as well as other stakeholder(s) actions related to the subject matter of this question;
- Describing local area staff trainings related to the subject matter (e.g. civil rights, equal opportunity, LEP, physical and programmatic accessibility, disability etiquette and sensitivity training) presented in this section and indicate when the trainings occurred;
- Listing the One-Stop program partners participating in local staff training indicative of the subject matter noted in this section; and
- Describing L&I's Office of Equal Opportunity annual compliance reviews and any technical assistance provided.

Appendix C: Local Area Plan Instructions

4.5. Describe how the local board will ensure the continuous improvement of eligible providers through the system and that such providers will meet the employment needs of local area employers, workers and job seekers. [20 CFR § 679.560(b)(5)(i)]

Expectation: Narrative must describe how the local board determines the variety, quantity and quality of workforce services (i.e. employment, education and training activities), the service providers and the activities that support this endeavor.

Factors being considered include, but are not limited to:

- Explaining the local board's periodic process that may employ regional and local area labor market information, High Priority Occupation list, as well as stakeholder input to help inform and meet workforce activity goals and objectives;
- Describing how the board projects the needs of employers, workers and jobseekers, including consideration of pipeline needs;
- Describing the local board's outreach plan designed to better understand employers and their needs as well as service providers (e.g., employment, training and education);
- Describing how the local board will ensure sufficient numbers of quality eligible providers that meet the needs of employers and individuals;
- Briefly explaining how the local board employs the procurement process cycle to support continuous improvement;
- Describing the local board's oversight roles assigned to the board and how it is implemented throughout the workforce service delivery system to support continuous improvement;
- Describing the local board's assessment and monitoring process of the service providers; include the review of training provider's performance data as well as qualitative information;
- Describing the local board's review, tabulation and consideration of customer satisfaction surveys; and
- Describing the local board's application of L&I's Eligible Training Provider policy; include strategies to grow in number and improve the overall quality of eligible training provider participation in the statewide eligible training provider list.

4.6. Provide a description and assessment of the type and availability of adult and dislocated worker employment and training activities in the local area. [20 CFR § 679.560(b)(6)]

Expectation: Narrative must describe all WIOA title I adult, or A, and dislocated worker, or DW, employment and training activities in the local area, including those involving basic literacy skills, and how activities are assessed. Additionally, the narrative must reflect how the local board selects and determines availability of A and DW activities for the benefit of participants, including individuals with barriers to employment.

Factors being considered include, but are not limited to:

- Describe how the local board identifies and then determines the types of A and DW employment and training activities that will be needed in the future;
- Identify the local board's key assessment criteria and processes used to select A and DW employment and training activities (include key procurement steps that lead toward a complete assessment of the activities);
- Explain the local board's consideration of future revisions and adoption of A and DW activity assessment criteria and processes;
- Articulate the board's effort to attract a greater quantity of Title I A and DW training providers including online providers;
- Identify key employment and training activity discrepancies (if any) and solutions the board is considering and planning to implement;
- Explain how the local board determines the quantity and quality of available A and DW employment and training activities;
- Explain the local board's WIOA Title I Priority of Service policy in brief terms (*do not attach the policy*). Explain how the board is continuing to review local area labor force data to support local area discretionary priority groups;
- Articulate the new emphasis WIOA has placed on the need to provide services to older youth and how the local board has responded to this requirement;
- If used, explain the process implemented to transfer program funds between A and DW programs (as needed) to help ensure sufficient training opportunities for eligible participants; and
- Describe the board's operational position and current actions relative to the development and promotion of Career Pathways, co-enrollment of participants across multiple WIOA programs, and work-based training activities such as apprenticeships and OJT.

4.7. How will training services be provided using individual training accounts, or ITAs, fund programs of study, or through the use of contracts for training services fund work-based trainings. [20 CFR 679.560(b)(18)]

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Expectation: Narrative must include how ITAs and contracts, as outlined in WIOA Sec. 134, will be used in a coordinated manner to provide such services in the local area.

Factors being considered include, but are not limited to:

- Describe the ITA cap for the local area, as well as the methodology used by the local board to determine the cap;
- Describe how the local board will determine the circumstances in which contracts will be used instead of ITAs; and
- Describe how the local board will ensure informed customer choice in the selection of training programs regardless of how the training services are to be provided.

Note: Narrative may contain how local areas select an ITA assessment that are valid and appropriate for the target population and must provide reasonable accommodation in the assessment process, if necessary, for individuals with disabilities.

4.8. Provide a description and assessment of the type and availability of youth workforce investment activities in the local area. [20 CFR § 679.560(b)(8)]

Expectation 1: Narrative must describe established priorities of the local board that allow for the service of as many eligible youth as possible, especially out-of-school youth (OSY), older youth and young people who are most at risk of not acquiring the necessary skills and abilities to attain meaningful employment, including individuals with a disability. Successful models of activities must be included.

Factors being considered include, but are not limited to:

- Describe the make-up of the local board's Youth Standing Committee and its role in youth program design, including making the 14 Program Elements available to participants;
 - Describe how to prioritize recruitment and services to OSY (WIOA 75 percent expenditure requirement);
 - Describe how to increase work experience opportunities for youth (WIOA 20 percent expenditure requirement);
 - Describe how to develop strong Career Pathways;
 - Describe how to increase the co-enrollment of youth into partner programming in alignment with the participant's individual service strategy and goals; and
 - Describe how to leverage TANF Youth Development funding (YDF) to offer workforce activities to even more local area youth.
 - Indicate which of the 14 WIOA Youth Program Elements will be provided, the local provider organization providing the programming, activity time (i.e. year-round or summer only) and the goals for the total number/percentage of TANF youth anticipated to receive a WIOA Youth Program Element;
 - Describe who is responsible for TANF Youth Development program participants, methods used for recruitment, and collaboration with local County Assistance Office(s), or CAOs, the Department of Human Services' Employment and Training providers, PA CareerLink®, and other WIOA funded programs. Explain any agreements regarding or referral of youth to be served with WIOA funds;
 - Describe how work experiences, enhanced by high-quality academic and workforce development programming, will be prioritized for TANF youth;
 - Describe in detail any job placement where the LWDB plans to increase the hourly wage (the Department strongly encourages a minimum of 10.35 p/hr) that it has typically previously offered participants for work experiences;
 - Describe who is responsible for recruiting employers/organizations for work experiences, building and maintaining these connections and what methods are used for recruitment;
 - If applicable, identify the prospective businesses, as well as any community, education and workplace partners, that will support TANF Youth programming. Briefly describe any expected monetary and/or non-monetary contributions to the local board's youth project(s);
 - If the local board plans to use a portion of TANF funding to offer incentives to TANF youth, describe in detail the type of incentive offered. Outline how the local board will clearly explain and make this incentive opportunity available to TANF-eligible youth. Explain how to accurately measure achievement of the established incentive requirements to ensure fair and equitable disbursement of any incentive awards to TANF youth program participants;
- Note:** The local board ability to offer TANF incentives is contingent upon the Department of Labor & Industry's review and approval of the local board's revised Incentive Policy, in alignment with 2 CFR 200 of WIOA and USDOL's TEGL No. 21-16.
- Provide the name, phone number and email address of the LWDB staff member responsible for implementation, tracking and reporting TANF YDF activities and expenditures;

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- Provide the following contact information for **each** TANF Youth Development Program-Youth Provider Sites in the LWDA: (1) Name, email and phone number of the Designated TANF Provider Contact Person(s) and (2) Name and Address of Provider’s Office Location/Worksite;
- Provide the name, phone number and email address of the LWDB staff member responsible for the compilation and submission of the DHS Qualification Spreadsheet on DocuShare; and
- Describe how the LWDB monitors local providers and who is responsible for the monitoring.

Expectation 2: Local boards must outline and define WIOA youth eligibility documentation requirements, including the “requires additional assistance to complete an education program or to secure and hold employment” criteria.

Expectation 3: Narrative must include a description of WIOA title IV Pre-Employment Transition Services provided to potentially eligible and eligible in-school youth with disabilities.

Expectation 4: Narrative must include local board strategies and collaborative actions with stakeholders to expose more youth support to YouthBuild, Job Corps and AmeriCorps programs and opportunities (if applicable). Data measuring the number of youth, and specifically opportunity youth, enrolled in these programs must be provided to support the narrative, as appropriate.

Note 1: Additionally, if the local area is designated as part of a *Planning Region* the local board, in concert with the other local boards comprising the *Planning Region*, may articulate regional level strategies and activities within the regional plan (see Appendix B: *Regional Plan Instructions*, prompt 1.4).

Note 2: Categories of ‘additional assistance’ are required to be defined and developed for both in-school youth, or ISY and out-of-school youth, or OSY. However, the 5 percent limitation for the use of this ‘additional assistance’ barrier category only applies to ISY. [WIOA (Department of Labor Only) Final Rule sections 681.300 and 681.310].

4.9. How will the local board coordinate workforce investment activities and ensure they are carried out in the local area with statewide rapid response? [20 CFR § 679.560(b)(7)]

Expectation: Narrative must describe the strategy and role of the local area and regional (if applicable) business service teams with the Rapid Response services. In addition, describe how the board is using the Rapid Response Guidance and Rapid Response and Trade Guidance released early 2017 to guide partners when providing rapid response services.

Note: Local boards should consider libraries as a possible place for Rapid Response teams to assemble, given their Wi-Fi, technology, and role in communities.

4.10. How will the local board coordinate relevant secondary and postsecondary education programs and activities with workforce investment activities to support strategies, enhance services and avoid duplication of service(s). [20 CFR § 679.560(b)(9)]

Factors being considered include, but are not limited to:

- Local board strategies to coordinate and enhance workforce services regarding secondary and post-secondary education. The description needs to include methods involved to avoid duplication of services;
- Accessibility improvement of post-secondary programs and expanding access to appropriate technology in career and technical education programs, especially to online training programs that may help to eliminate skill gaps;
- Local board actions related to Perkins Act Section 134 biennial “CTE comprehensive needs assessment”; include the local board’s role with secondary, adult and postsecondary Perkins V recipients;
- Relevant education programs that include adult education, community colleges, community education councils, private licensed schools; and
- Basic skills training.

4.11. Describe the plans, assurances and strategies for maximizing coordination, improving service delivery and avoiding duplication of Wagner-Peyser Act (29 U.S.C. 49 et seq.) services and other services provided through the one-stop service delivery system. [20 CFR § 679.560(b)(11)]

Expectation: The narrative must describe strategies to implement the one-stop system operational goals and how these strategies will maximize coordination among one-stop system partners. It must specifically describe how the required partners’ activities and services are improved and duplication is avoided, as well as how merit staff and contracted service providers are coordinated. Additionally, the narrative must contain information surrounding the roles of the operator and site administrator(s) in coordinating local area program providers’ efforts and improvement of services.

Factors being considered include, but are not limited to:

- How the roles and responsibilities among partner programs are coordinated to achieve optimum results and avoid duplication of services;

Appendix C: Local Area Plan Instructions

- The efforts that are or will be implemented to improve program partner integration at PA CareerLink® centers;
- The one-stop delivery system's referral mechanism;
- The established minimum requirements for a PA CareerLink® career services orientation, the method used for directing basic career services customer flow, use of a customizable initial intake form and a customizable template for developing Individual Employment Plans to ensure consistency and support alignment of services across programs, thus reducing duplicate data among partners; and
- The program partner's staff development efforts designed to strengthen the professional skills of co-located partners' staff in PA CareerLink® centers, such as cross-program staff training. As a partner, adult education may participate in delivering training in professional skills.

4.12. How will the local board coordinate WIOA title I workforce investment activities with adult education literacy activities under WIOA Title II? [20 CFR § 679.560(b)(12)]

Factors being considered include, but are not limited to:

- Indicate if WIOA Title II adult education providers were involved in the development of the local area plan and the providers' involvement with the topics presented in Appendix C, prompt 4.11;
- Describe how the local board will carry out the review of applications to provide adult education and literacy activities under WIOA Title II for the local area to determine whether such WIOA Title II applications are consistent with the local area plan. The local board review must be consistent with WIOA Sections 107(d)(11)(A) and (B)(i) and WIOA Section 232 to ensure alignment with its local area plan and the coordinating of the activities described in the local area plan. Applicants for WIOA Title II grants are required to demonstrate alignment of proposed activities with the local area plan as one of the 13 required considerations under WIOA Title II;
- Describe how the local board will ensure it will make recommendations, if appropriate, to PA Department of Education (PDE) to promote alignment with the local area plan; and
- Describe how the local board will coordinate WIOA Title I workforce activities with those Title II adult education and literacy activities designed to be associated with WIOA Title I (i.e. for when the individuals participating in title I activities have basic education needs and when individuals in Title II programs have needs that may be address through Title I services or other services through the one-stop centers).

Note 1: Any WIOA Title II activities described must be allowable activities under Title II. These may include basic skills instruction both at the one-stop center and in other locations around the local area; compliant administration of standardized basic skills assessments; and workforce preparation activities for individuals receiving title II basic skills instruction.

Note 2: Guidance on the role the local board will play in their assistance with WIOA title II solicitation and procurement.

Local boards are not directly involved in WIOA Title II solicitation and procurement; the title II competition is run solely by PDE, and all funding decisions are made solely by PDE. The local boards will review applications submitted to PDE for WIOA Title II funds for alignment with the goals and strategies of the local area plan, and then provide recommendations to PDE on ways to improve alignment, if applicable.

Federal regulations require PDE to establish the process by which the local boards will review the WIOA Title II applications for alignment with the local area plan and submit recommendations to PDE for improvement of alignment. PDE will receive the applications for Title II funds and then distribute applications to the appropriate LWDB for review. PDE will develop related review documents and rubrics and provide them to the local boards along with training on how to conduct the review and return the documents to PDE. All local boards must use the review documents and rubrics provided by PDE. Local boards have flexibility in determining which members of the local board participate in the review of applications. The review work may be led by local board staff but cannot be limited to local board staff. Board members connected to entities that submit applications for WIOA title II funds or that have other conflicts of interest cannot participate in the review.

4.13. What services, activities and program resources will be provided to participants, including those outlined at WIOA Sec. 3(24), *Individuals with a Barrier to Employment*, in the local area?

Expectation: Narrative must list the services provided to participants beginning with universal services (e.g. Wagner-Peyser Act based Employment Services) and concluding with a description of how individuals with a barrier(s) to employment are uniquely served.

Factors being considered include, but are not limited to:

- Describe how the one-stop delivery system employs a methodical process to intake customers, establish participant status, determine needs of the participant and identify any barrier(s) to employment;
- Describe how the one-stop delivery system employs a methodical outreach process that presents the benefits of the workforce development system to individuals and groups. A description of outreach activities may include information

Appendix C: Local Area Plan Instructions

sessions regarding services that partner agencies provide and how to access such services. These outreach efforts may include presentations on available services that target certain populations, specifically targeting individuals with barrier(s) to employment;

- Describe how the one-stop delivery system provides the appropriate services and resources equally to participants; and
- Describe services provided to individuals with disabilities eligible for services under WIOA Title IV.

4.14. What services, activities and program resources will be provided to businesses and employers in the local area? [20 CFR § 679.560(b)(3)]

Factors being considered include, but are not limited to:

- Roles performed by the PA CareerLink® Business Services Team, or BST, within the scope of the region as a whole; describe the BST organizational structure and who manages the BST; describe coordination efforts amongst BST members as well as actions of the local board; and indicate the program providers that comprise the BST (e.g. Veteran program LVERs, OVR staff, Rapid Response staff);
- For program partners not specifically represented on the BST, describe how these partners are connected to employers (e.g. provision of adult basic education and workplace literacy information to employers);
- Describe regional coordination of messaging and engagement; which program providers are making employer visits and the collaboration that occurs during these visits; and the management of tracking business related services and associated data analysis for all program partners to share;
- What WIOA Title III (Wagner-Peyser Act) employer-based services, as well as other services and resources made available from partners are made available to business customers; describe how the activities and services are accessed by business and employers or their legal representatives; and offer insight into how workforce-oriented programs and services are being adopted by businesses and employers in the region;
- What WIOA Title IV (Rehabilitation Act of 1973) employer-based services are made available to business customers;
- Describe how businesses and employers engage with education; and
- If there are local board innovative practices such as the use of board staff and contracted entities providing business engagement activities and services, the narrative must detail the administrative and operational relationship between the BST and the local board business engagement efforts as well as demonstrating the reduction of duplicative services and activities.

4.15. How will the local board coordinate WIOA Title I workforce investment activities with the provision of transportation and other appropriate supportive services in the local area? [20 CFR § 679.560(b)(10)]

The narrative must explain the local area's set of strategies designed to:

- Identify supportive services and resources (e.g. transportation, public libraries, childcare, legal aid, housing, mental health, refugee and immigration services, vocational rehabilitation services, independent living services, community reentry programs); and
- Coordinate supportive services and resources to allow customers to participate.

5. COMPLIANCE

The prompts in this section are focused on the local area's compliance with federal, state and local government requirements.

5.1. Describe the cooperative agreements that define how all local area service providers will carry out the requirements for integration of and access to the entire set of services available in the local area one-stop delivery system. [20 CFR § 679.560(b)(13)]

Expectation: Narrative must include cooperative agreements (as defined in WIOA sec. 107(d)(11)) between the LWDB or other local area entities described in WIOA sec. 101(a)(11)(B) of the Rehabilitation Act of 1973 (29 U.S.C. 721(a)(11)(B)) and the local office of a designated State agency or designated State unit administering programs carried out under Title I of the Rehabilitation Act (29 U.S.C. 720 et seq.) (other than sec. 112 or part C of that title (29 U.S.C. 732, 741) and subject to sec. 121(f)) in accordance with sec. 101(a)(11) of the Rehabilitation Act (29 U.S.C. 721(a)(11)) with respect to efforts that will enhance the provision of services to individuals with disabilities and to other individuals, such as cross training of staff, technical assistance, use and sharing of information, cooperative efforts with employers and other efforts at cooperation, collaboration and coordination.

5.2. What is the process the local board uses to ensure the collection of the debts of lower-tier sub-recipients, because of audits?

Expectation: Narrative must describe the local board's debt-collection system and how grantees will utilize this system aggressively to ensure the collection of debts established because of sub-recipient audits. The narrative must also include procedures the grantee and fiscal agent will follow, once the amount of disallowed costs' final determination is made. Once the final determination

Appendix C: Local Area Plan Instructions

establishes the amount of disallowed costs, the grantee and fiscal agent must follow the procedures outlined herein to collect these disallowed costs.

5.3. What action(s) is the local board taking (or will take) towards becoming or remaining a high-performing board? [20 CFR § 679.560(b)(17)]

Expectation: Narrative must address the fact that the local board will implement the actions necessary to become or remain a high-performing board once such guidance has been issued.

Factors being considered include, but are not limited to:

- Attainment of the Governor’s goals as described in PA’s WIOA Combined State Plan;
- Successfully performed by meeting the local area negotiated federal performance goals;
- Sustained fiscal integrity throughout the local area and all interactions on a regional level (include employment of appropriate fiscal practices such as the adoption of internal controls and more robust procurement policies);
- Attainment of successful monitoring reports and other evaluations by federal and state oversight staff;
- Creation and employment of workforce governance and service delivery ‘best practices’ that may be modeled;
- Adoption and use of new and improved methods to reach and serve individuals with barriers to employment;
- Adoption and use of new career and training services provided for the WIOA Title I programs;
- Attainment of Pennsylvania’s training expenditure targets;
- Successful regional coordinated employer engagement practices between local Business Service Team(s) and local board(s) direct activities; and
- Sector initiatives measured through the employment of qualitative and quantitative measurements.

Note: Guidance pertaining to the actions a local board must take towards becoming or remaining a high-performing board are currently being developed. L&I considers a high-performing local board as a board that ensures the yearly attainment of goals, strategies and operational elements articulated in applicable law, regulation, contract(s) and agreement(s), PA’s WIOA Combined State Plan, Commonwealth policies, program grant and associated requirements and guidance are achieved; the board’s varied responsibilities including fiduciary and administrative are performed in a professional manner; its mission of being accountable to the workforce area stakeholders is upheld; and abides by other factors as determined by the PA Workforce Development Board.

5.4. What is the process the local board uses to provide an opportunity to have input into the development of the local area plan, particularly for representatives of business, education, labor organizations, program partners, public agencies and community stakeholders? [20 CFR § 679.560(b)(19)]

Expectation: Narrative must describe the robust collaboration among the many stakeholders to inform the contents of the plan. While WIOA and its associated regulations pay particular attention to the representatives of business, education and labor organizations, the narrative must include a description of the multiplicity of stakeholders that make up the local workforce system.

5.5. What is the process the local board uses to provide a 30-day public comment period prior to plan submission? [20 CFR § 679.560(b)(19)]

Expectation: Narrative must include a description of the process used by the local board (or planning region) to ensure the public had 30 days to review and comment on the contents of the proposed local area plan prior to its submission to the Commonwealth.

Note 1: In accordance with this policy, planning regions are required to post the entire regional plan for public comment in each of the local areas that make up the planning region.

Note 2: Comments submitted during the public comment period must be submitted along with the plan. Additionally, any comments made by a local board as a result of such comments, must also be included.

Appendix C: Local Area Plan Instructions

ATTESTATIONS

By checking the box adjacent to each line item, the local board attests to ensuring the compliance components and documents listed are (or will be) in place and effective prior to June 30, 2021.

The following components and documents, including local workforce system policies, must be reviewed and revised as to be aligned with WIOA for the current planning cycle. Each item must be available to L&I at any time during the planning process and monitoring or auditing processes. L&I is not requiring copies of such documents to be attached to regional or local area plans at this time.

- The _____ Local Workforce Development Area attests that each of the below referenced policies contain any required language or content and were last revised, if necessary, by this plan's effective date.
- Agreement between all counties and other local governments, if applicable, establishing the consortium of local and chief elected officials.
- Agreement between the chief elected official(s) and the fiscal agent, if a fiscal agent is designated.
- Agreement between the local area elected official(s) and the LWDB.
- LWDB policy and process that provides for nomination, appointment and removal of board members; resolutions; bylaws; code of conduct; and conflict of interest.
- Financial management policy and process including cost allocation plan; internal controls; cash management; receipts of goods; cost reimbursement; inventory and equipment; program income; travel reimbursement; audit requirements and resolution; annual report; property management; debt collection; and allowable costs.
- Local area procurement policy that must describe formal procurement procedures.
- Local area MOU.
- Program management policies and processes addressing, at a minimum, layoff assistance; equal opportunity for customers; complaints and grievances; supportive services; needs related payments; incentives; file management; eligibility determination and verification; self-sufficiency criteria; self-attestation and certification random sampling; priority of service; stipends and incentives; training verification/refunds; individual training accounts; contracts for training services; statewide training providers list and eligibility verification; local area training provider list and eligibility criteria and process; "additional assistance" definition; transitional jobs thresholds; work-based training policies including incumbent worker training, OJT, CT, and apprenticeship.
- Risk management policy and process including records retention and public access; public records requests; monitoring, grievance; incident; and disaster recovery plan.
- Human resources policy and process including employee classification; benefits; holidays and PTO; recruitment and selection; employee development; discipline; layoffs, terminations and severance; sexual harassment; and equal opportunity and non-discrimination.
- Professional services contract(s) for administrative services such as staffing and payroll, if applicable.

Appendix D: Regional Plan template

Region Workforce Development Area name: _____

Effective Date: _____

1.1. Identification of the region.

Text

1.2. Based on the analysis of the regional labor market and economic conditions, describe the region's workforce and economic development-oriented vision and goals.

Text

1.3. Describe the collection and analysis of regional labor market data (in conjunction with the commonwealth).

Text

1.4. Describe the regional service strategies aimed at achieving the vision and goals established for the region.

Text

1.5. Describe the development and implementation of sector initiatives for in-demand industry sectors or occupations for the region.

Text

1.6. Describe how the region will connect employer labor force requirements and occupational demands with the region's labor force, including individuals with barriers to employment.

Text

1.7. Describe the coordination of transportation and other supportive services for the region.

Text

1.8. Describe the region's strategy to increase participation on the statewide eligible training provider list.

Text

Appendix D: Regional Plan template

- 1.9. Describe how the region established administrative cost arrangements, including the pooling of funds for administrative costs, as appropriate, for the region.*

Text

- 1.10. Describe the agreement between the local boards that describes how the planning region will collectively negotiate and reach agreement with L&I on local levels of performance for, and report on, the performance accountability measures described in section 116(c), for each of the local areas within the planning region.*

Text

Appendix E: Local Area Plan Template

Local Workforce Development Area name: Text

Effective Date: Text

INTRODUCTION

1. STRATEGIC PLANNING: Local Area Workforce and Economic Analysis

1.1. *Identify the composition of the local area's population and labor force.*

TEXT

1.2. *How are skills gaps defined in the local area? Provide a description of the skills that are required to meet the needs of employers in region/local area?*

TEXT

1.3. *What are the challenges the local area faces in aligning existing labor force skills and education and training activities with the needs of regional employers?*

TEXT

1.4. *Provide an analysis of local area workforce development activities, including education and training.*

TEXT

1.5. *Describe strategic planning elements including a regional analysis of economic conditions.*

TEXT

2. STRATEGIC PLANNING: Vision and Goals

2.1. *What are the local board's strategic vision and goals for preparing its workforce?*

TEXT

2.2. *What is the local board's strategy to work with the entities that carry out the core programs to align resources available to the local area, in order to achieve the strategic vision and goals for the local area?*

TEXT

Appendix E: Local Area Plan Template

- 2.3. *How will the local board's vision and goals align with, support and contribute to the governor's vision and goals for the state's workforce development system, as well as any of the goals and strategies articulated in the regional plan?*

TEXT

- 2.4. *What are the local levels of performance that have been negotiated with the governor and chief elected officials?
How will the local board's goals relate to the achievement of these measures?*

TEXT

3. OPERATIONAL PLANNING: Local Area Workforce System and Investment Strategies

- 3.1. *Provide a descriptive overview of the governance structure for the workforce system, including key stakeholders and entities in the local area.*

TEXT

- 3.2. *What are the programs included in the local workforce delivery system and how will the local board work with the entities carrying out all workforce programs to support service alignment?*

TEXT

- 3.3. *How will the local board work with the entities carrying out core programs to:*
➤ *Expand access to employment, training, education and supportive services for eligible individuals, particularly individuals with barriers to employment.*

TEXT

- *Facilitate the development of Career Pathways and co-enrollment, as appropriate, in core programs (specify on-ramps from adult education).*

TEXT

- 3.4. *What strategies will be implemented in the local area to improve business and employer engagement that:*
➤ *Support a local area workforce development system that meets the needs of businesses in the local area;*

TEXT

- *Manage activities or services that will be implemented to improve business engagement;*

TEXT

Appendix E: Local Area Plan Template

- *Better coordinate regional workforce and economic development strategy, messaging, engagement and programs; and*

TEXT

- *Strengthen linkages between the PA CareerLink® service delivery system and unemployment insurance (UI) programs.*

TEXT

- 3.5. *How will the local board coordinate local area workforce investment activities with regional economic development activities that are specific to a local area? How will the local board promote entrepreneurial skills training and microenterprise services?*

4. OPERATIONAL PLANNING: Local Area Workforce Delivery System

- 4.1. *Provide a descriptive overview of the local area workforce delivery system, including key stakeholders and entities in the local area.*

TEXT

- 4.2. *Identify the one-stop partners (required and other) authorized to provide required and other programs within the local area. Describe briefly the role(s) of the one-stop partners (required and other).*

TEXT

- 4.3. *How will the local board facilitate access to services provided through the one-stop service delivery system?*

TEXT

- 4.4. *How will entities within the one-stop service delivery system, including one-stop operators and the one-stop partners, comply with WIOA Sec. 188 (as applicable), and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101, et seq.) regarding the physical and programmatic accessibility of facilities, programs and services, technology, and materials for individuals with disabilities?*

TEXT

- 4.5. *Describe how the local board will ensure the continuous improvement of eligible providers through the system and that such providers will meet the employment needs of local area employers, workers and job seekers.*

TEXT

Appendix E: Local Area Plan Template

- 4.6. *Provide a description and assessment of the type and availability of adult and dislocated worker employment and training activities in the local area.*

TEXT

- 4.7. *How will training services be provided through the use of individual training accounts, or ITAs, that fund programs of study, or through the use of contracts for training services that fund work-based trainings.*

TEXT

- 4.8. *Provide a description and assessment of the type and availability of youth workforce investment activities in the local area.*

TEXT

- 4.9. *How will the local board coordinate workforce investment activities and ensure they are carried out in the local area with statewide rapid response?*

TEXT

- 4.10. *How will the local board coordinate relevant secondary and postsecondary education programs and activities with workforce investment activities to support strategies, enhance services, and avoid duplication of service(s).*

TEXT

- 4.11. *Describe the plans, assurances and strategies for maximizing coordination, improving service delivery and avoiding duplication of Wagner-Peyser Act (29 U.S.C. 49 et seq.) services and other services provided through the one-stop service delivery system.*

TEXT

- 4.12. *How will the local board coordinate WIOA Title I workforce investment activities with adult education literacy activities under WIOA Title II?*

TEXT

- 4.13. *What services, activities and program resources will be provided to participants, including those outlined at WIOA Sec. 3(24), Individuals with a Barrier to Employment, in the local area?*

TEXT

Appendix E: Local Area Plan Template

4.14. *What services, activities and program resources will be provided to businesses and employers in the local area?*

TEXT

4.15. *How will the local board coordinate WIOA Title I workforce investment activities with the provision of transportation and other appropriate supportive services in the local area?*

TEXT

5. COMPLIANCE

5.1. *Describe the cooperative agreements that define how all local area service providers will carry out the requirements for integration of and access to the entire set of services available in the local area one-stop delivery system.*

TEXT

5.2. *What is the process the local board uses to ensure the collection of the debts of lower-tier sub-recipients, as a result of audits?*

TEXT

5.3. *What action(s) is the local board taking (or will take) towards becoming or remaining a high-performing board?*

TEXT

5.4. *What is the process the local board uses to provide an opportunity to have input into the development of the local plan, particularly for representatives of business, education, labor organizations, program partners, public agencies and community stakeholders?*

TEXT

5.5. *What is the process the local board uses to provide a 30-day public comment period prior to plan submission?*

TEXT

Appendix E: Local Area Plan Template

ATTESTATIONS

By checking the box adjacent to each line item, the local board attests to ensuring the compliance components/documents listed are (or will be) in place and effective prior to June 30, 2021.

The following components and documents, including local workforce system policies, must be reviewed and revised as to be aligned with WIOA for the current planning cycle. Each item must be available to L&I at any time during the planning process and monitoring or auditing processes. L&I is not requiring copies of such documents to be attached to regional or local area plans at this time.

The _____ Local Workforce Development Area attests that each of the below referenced policies contain any required language or content and were last revised, if necessary, by this plan's effective date.

Agreement between all counties and other local governments, if applicable, establishing the consortium of local and chief elected officials.

Agreement between the chief elected official(s) and the fiscal agent, if a fiscal agent is designated.

Agreement between the local area elected official(s) and the LWDB.

LWDB policy and process that provides for nomination, appointment and removal of board members; resolutions; bylaws; code of conduct; and conflict of interest.

Financial management policy and process including cost allocation plan; internal controls; cash management; receipts of goods; cost reimbursement; inventory and equipment; program income; travel reimbursement; audit requirements and resolution; annual report; property management; debt collection; and allowable costs.

Local area procurement policy that must describe formal procurement procedures.

Local area MOU.

Program management policies and processes addressing, at a minimum, layoff assistance; equal opportunity for customers; complaints and grievances; supportive services; needs related payments; incentives; file management; eligibility determination and verification; self-sufficiency criteria; self-attestation and certification random sampling; priority of service; stipends and incentives; training verification/refunds; individual training accounts; contracts for training services; statewide training providers list and eligibility verification; local area training provider list and eligibility criteria and process; "additional assistance" definition; transitional jobs thresholds; work-based training policies including incumbent worker training, OJT, CT, and apprenticeship.

Risk management policy and process including records retention and public access; public records requests; monitoring, grievance; incident; and disaster recovery plan.

Human resources policy and process including employee classification; benefits; holidays and PTO; recruitment and selection; employee development; discipline; layoffs, terminations and severance; sexual harassment; and equal opportunity and non-discrimination.

Professional services contract(s) for administrative services such as staffing and payroll, if applicable.

Appendix F: Epilogue

The policy has not yet been posted for public comment.

Attachment 1: WIOA Title I Programs Performance Accountability Table

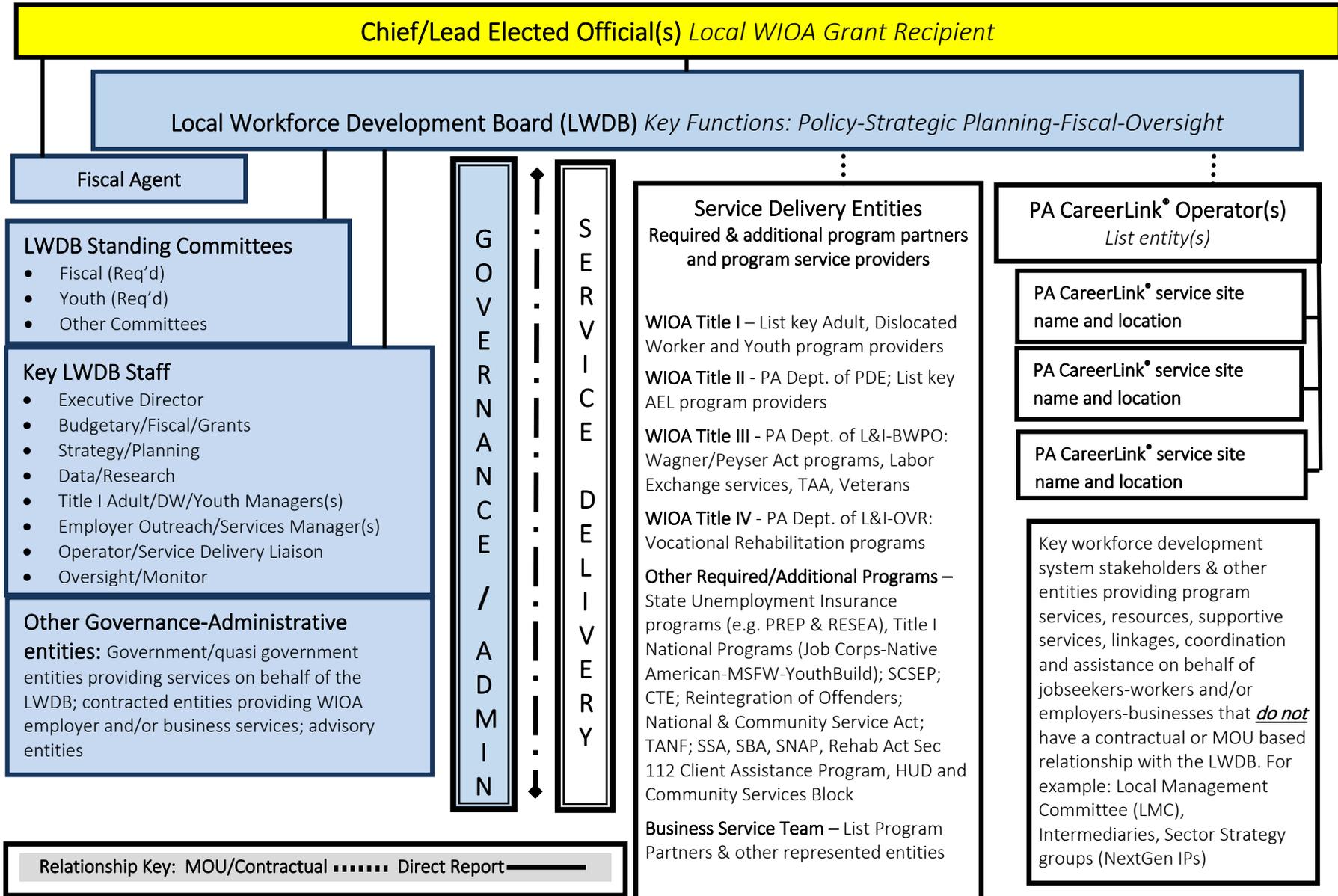
The Pennsylvania Department of Labor & Industry, or L&I, negotiates WIOA Title I programs performance goals with the U. S. Department of Labor on a two-year program cycle, which aligns with the WIOA planning requirement of reviewing WIOA Local Area Plans every two years. In an effort designed to meet or exceed the state WIOA performance goals, PA negotiates these same goals with PA’s local workforce development areas, or LWDA, to optimally set each local area’s WIOA Title I performance goal levels so that, collectively, the state negotiated performance goals are met or exceeded.

The *WIOA Title I Programs Performance Accountability Table* is for the benefit of the public and must be updated accordingly. Local boards must edit the table’s two columns with the appropriate program year(s) to correctly match the **most recent*** LWDA-negotiated performance goals and attained performance results. This completed table must be publicly posted with the local area plan. The LWDB does not need to perform a WIOA plan modification as this table is revised; email notification to local area workforce development stakeholders will suffice.

LWDA Name:		
WIOA Title I Programs (Adult-Dislocated Worker-Youth) Performance Measures	LWDA’s WIOA Title I Programs <u>Negotiated Performance Goals</u> - <i>* Program Year(s): 20XX – 20XX</i>	LWDA’s WIOA Title I Programs <u>Attained Performance Results</u> - <i>* Program Year: 20XX</i>
Employment (Second Quarter after Exit)	Negotiated Goals	Attained Performance
Adult	%	%
Dislocated Worker	%	%
Youth	%	%
Employment (Fourth Quarter after Exit)	Negotiated Goals	Attained Performance
Adult	%	%
Dislocated Worker	%	%
Youth	%	%
Median Earnings (Second Quarter after Exit)	Negotiated Goals	Attained Performance
Adult	%	%
Dislocated Worker	%	%
Youth	%	%
Credential Attainment Rate	Negotiated Goals	Attained Performance
Adult	%	%
Dislocated Worker	%	%
Youth	%	%
Measurable Skill Gains	Negotiated Goals	Attained Performance
Adult	%	%
Dislocated Worker	%	%
Youth	%	%

Attachment 2: WIOA Local Workforce Development System Organizational Chart model

The organizational chart is for the benefit of the public and must be used to describe the attributes of the local workforce development system. This chart should be reviewed annually for revisions. The local board may supplement this model with clarifying charts. If multiple pages are needed to represent the local system, ensure that “Governance/Administrative” and “Service Delivery” information is displayed on separate pages respectfully. Use of model sub-titles is required. Publicly post the organizational chart with the local area plan. A WIOA plan modification is not required when revision occurs with this document.



Attachment 4: Local Workforce Development System Supporting Data

Local area plans have multiple sections requiring various data methodologies needed to support narrative. When documenting data methodologies, plan drafters are encouraged to reference the data location in the local area plan prompt narrative and move referenced data to this attachment.

Local boards must enter the prerequisite information (i.e. LWDA name, section number with prompt, input data referenced in the plan’s prompt narrative and cite data source). The completed *Supporting Data* attachment must be submitted with the local area plan and publicly posted with all other supporting documentation as referenced in the WIOA Regional and Local Area Plan Guide.

Example of referenced data input is below.

LWDA Name: ANY LWDA NAME

Section 1.1: Identify the composition of the local area’s population and labor force.
--

Labor Market Information: Table 1

Time Period	Labor Force	Employed	Unemployed	Unemployment Rate
2010	305,400	280,000	25,400	8.3%
2011	306,400	283,600	22,900	7.5%
2012	309,900	286,900	23,100	7.4%
2013	309,000	286,900	22,100	7.2%
2014	305,800	288,500	17,300	5.7%
2015	304,300	288,300	16,000	5.3%
2016	305,000	288,100	16,800	5.5%
January, 2017	301,100	286,500	14,600	4.8%
February, 2017	302,600	287,500	15,100	5.0%
March, 2017	304,200	289,400	14,800	4.9%
April, 2017	305,400	289,400	16,100	5.3%
May, 2017	305,800	290,200	15,700	5.1%

Source: Center for Workforce Information and Analysis, based on the May 2017 preliminary dataset using seasonally adjusted values.

Attachment 4: Local Workforce Development System Supporting Data

Template:

LWDA Name:

Section __: _____

Input Data Graphic

Note: *under data graphic, cite data source.*

Pennsylvania WIOA Plans Submission Checklist
Fiscal Year 2021-2024 WIOA Regional and Local Area Plans

This checklist is used to ensure completeness; indicate each submitted item prior to emailing this form and items listed below to RA-LI-BWDA-Policy@pa.gov .

	Cover Letter <i>(see submission cover letter template and page 4 of guide for additional details)</i>
	Regional Plan <i>(if in a planning region)</i> and Local Area Plan saved in Microsoft Word
	Provided documentation of public notice/public comment <i>(see pages 3-5 of guidance for additional details)</i>
	Attestations Completed
	Attachment 1: Local Area WIOA Title I Programs Performance Accountability Table
	Attachment 2: Local Workforce Development System Organizational Chart
	Attachment 3: Local Workforce Development System Program Partner-Provider List
	Attachment 4: Local Workforce Development System Supporting Data
	Option 1 or 2 is only used when submitting a planned two-year <u>modification</u>:
	Option 1: WIOA Plan Review and Modification Form (Local Area Plan)
	Option 2: If in a planning region, the designated point of contact will complete the <u>WIOA Plan Review and Modification Form</u> (Regional Plan) <i>and will disperse</i> the <u>Planning Region CEO and LWDB Chair Dated Signatures Supplemental Form</u> (Regional Plan) to the rest of the planning region. WIOA Plan Review and Modification Form (Local Area Plan)
	Only use Option 3 when submitting a modification <u>NOT within a two-year modification period</u>:
	Option 3: If in a planning region <u>and</u> the LWDB’s Local Area Plan modification is deemed to provide a minor impact on the Planning Region, the <u>Planning Region CEO and LWDB Chair Dated Signatures Supplemental Form</u> (Local Area Plan) is used. WIOA Plan Review and Modification Form (Local Area Plan)

Submission Cover Letter Template

LWDB letterhead

Date

To: (If four-year plan) Deputy Secretary for Workforce Development of Pennsylvania
(If modification) Bureau of Workforce Development Administration Director

On behalf of the LWDB Name, I approve the submission of the PY 20__ - 20__ WIOA (Regional, *if applicable*, and) Local Plan(s) for list name of county/ies. These documents are being submitted for your review with the concurrence, support and approval of the LWDB Name at its meeting on month, date, year as per WIOA regulations WSP# 108-01, Change 1. The (regional, *if applicable*, and) local plan(s) provide the framework in defining how a designated area's workforce development system will achieve the purposes of WIOA. Therefore, the LWDB Name (explanation of plan creation/benchmarks achieved. *Please do not exceed 8 summary sentences*).

The LWDB Name solicited public input in accordance with WIOA Sec. 107 and 20CFR Part 679 for the period of month, date, year to month, date, year. The plan(s) were available for review on the name of web address **and/or** a public legal notice was published in amount location: i.e. newspapers. A screen shot of the online posting and/or copies of legal notice with dates of public notification are also included in the submission. No comments were received during the 30-day public comment period **OR** Comments were received as referenced on page ____ of the submitted plan.

If you have any questions or need additional assistance, please do not hesitate to contact name of designated point of contact person by telephone at enter phone number or via email at email address.

My/our signature(s) below certify/(ies) that I/we approve the submission of the PY 20__ - 20__ WIOA (Regional, *if applicable*, and) Local plan(s) to the PA Department of Labor & Industry.

Best Regards,

Signature

Full name/title of
LWDA Chief Elected Officer (CEO)

Signature

Full name/title of
LWDB Chair

WIOA Plan Review and Modification Form (Regional Plan)

Single Local Area Regions may disregard this form

A plan modification may be submitted at any time; however, there are certain procedural steps required as part of the modification process. Refer to the PA Department of Labor & Industry's, or L&I, WIOA Regional and Local Area Plan Guide for additional direction. A planning region's designated point of contact, or POC, completes and submits this form.

I. Planning Region Plan: Designated Submitting Local Workforce Development Board, or LWDB	
Region Name: <small>Click here to enter text.</small>	LWDB Name <i>(i.e. designated name, not D.B.A.):</i> <small>Click here to enter text.</small>
Local Workforce Development Areas, or LWDBAs, that compose the Planning Region: <small>Click here to enter text.</small>	
Name of Designated POC: <small>Click here to enter text.</small>	
Organization: <small>Click here to enter text.</small>	Title: <small>Click here to enter text.</small>
Telephone Number: <small>Click here to enter text.</small>	E-mail Address: <small>Click here to enter text.</small>

II. WIOA Regional Plan Review and Modification Information	
Was the plan reviewed per WIOA and L&I's WIOA Regional and Local Area Plan policy and guide? <i>(yes or no)</i>	
Indicate the economic condition and labor market information source(s) used in the plan review process: <i>List data sources:</i>	
Did the regional plan review warrant plan modifications? <i>(yes or no)</i> If "no" plan modification, proceed to section IV.	
Was the modified regional plan draft provided to affected LWDB(s) prior to public posting? <i>(yes or no)</i>	
Have all planning region LWDB(s) approved final regional plan mod: <i>(yes or no)</i>	Public Comment Period: <i>MM/DD/YYYY - MM/DD/YYYY</i>
Date of the last LWDB to approve mod: <i>MM/DD/YYYY</i>	Comments received: <i>(yes or no)</i>
	Plan Modification Effective Date: <i>MM/DD/YYYY</i>

III(a). Requested WIOA Regional Plan Changes		
Page #	Change due to a public comment	Describe a change in as few words as possible to direct the reviewer to the marked narrative. Do not describe mechanical or grammatic edits.
#	<i>(yes or no)</i>	Change
#	<i>(yes or no)</i>	Change
#	<i>(yes or no)</i>	Change
<i>If needed, please use supplemental Section III(b). Requested Plan Changes – Continuation Page</i>		

IV. Submitting LWDB Executive Director's Attestation		
Submitter attests affected LWDB Chief Elected Officers, or CEOs, and LWDB Local Boards approved the plan review and/or the submitted plan.		
Name: <small>Click here to enter text.</small>	Signature:	Date: <i>MM/DD/YYYY</i>

V. Submission and Feedback Information (L&I Use Only)	
Date L&I received:	Is plan modification supporting document package complete? Y / N
Date L&I acknowledged:	Has a cursory review been completed, and if needed, acted upon? Y / N
Has the plan been reviewed? Y / N	Are the reviewers satisfied with the plan mod? Y / N

VI. BWDA Chief or Policy Coordination Supervisor Recommendation for Approval		
Name: <small>Click here to enter text.</small>	Signature:	Date: <i>MM/DD/YYYY</i>

VII. BWDA Bureau Director's Approval		
Name: <small>Click here to enter text.</small>	Signature:	Date: <i>MM/DD/YYYY</i>

** If no plan modifications are required, email a copy of this form's page 1 to L&I as evidence that a plan review occurred.*

WIOA Plan Review and Modification Form (Regional Plan)

WIOA Plan Modification Instructions – Posting, Submission and Technical Support Information

Prior to submitting a modified WIOA Regional or Local Area Plan and its supporting documents for state approval:

- Review the WIOA Regional and Local Area Plan Guide *Section III Public Comment Period* and *Section IV Plan Submission Requirements and Approval (subsection Plan Submission Requirements, the third and fourth bullet points)* for additional direction.
- The submitting LWDB must address any comments received following the public comment period. In lieu of duplicating any plan changes influenced by public comments within the *submission cover letter*, the LWDB may summarize plan changes due to public comment(s) within this form's *Section III Requested Plan Changes* by denoting any public comment influenced plan change accordingly. Otherwise, the public comment changes must be summarized within the *submission cover letter*.
- Ensure affected LWDB(s) and CEOs duly approved the plan modification as evidenced by signing and dating appropriate supporting documents.
- Modified WIOA plans not documented as being duly approved by the submitting LWDB(s) cannot be approved by the state.

Submitting a WIOA Regional Plan Modification form for state approval:

- The planning regions' point of contact, or POC, will submit a WIOA Plan Review and Modification Form (Regional Plan).
 - Sections I-IV must be completed and provided with the modified plan submission package.

Planning Region Additional Guidance:

- The POC will complete Section I and the top of Section II on the Planning Region CEO and LWDB Chair Dated Signatures Supplemental Form (Regional Plan), located on page 4, for their perspective planning region.
- POC will disperse partially completed document to the rest of planning region via email.
 - If modifications were made, the POC must also include *Section III Requested Plan Changes* on the WIOA Plan Review and Modification Form (Regional Plan) for review.
- POC will remind each non-submitting LWDB to complete signature sections noting that the LWDB, LWDB chair and LWDA CEO(s) approved the modified WIOA Regional Plan.
- POC will advise non-submitting LWDB that once this form is completed, the LWDB needs to submit the Planning Region CEO and LWDB Chair Dated Signatures Supplemental Form (Regional Plan) back to the POC with their submitted modified local area plan (if applicable) and other required documentation as referenced in L&I's WIOA Regional and Local Area Plan Guide.

Please direct plan submissions and questions to the BWDA Policy Coordination resource account: RA-LI-BWDA-Policy@pa.gov

WIOA Plan Review and Modification Form (Regional Plan)

Planning Region CEO and LWDB Chair Dated Signatures Supplemental Form

Single Local Area Regions may disregard this form

Point of Contact, or POC: Planning regions' POC will complete Section I and the top of Section II for the benefit of all LWDA CEOs and LWDB Chairs composing the WIOA region. WIOA Plan Review and Modification Form (Regional Plan)'s *Section III Requested Plan Changes* must be provided to LWDB's signers for their review, if applicable. POC will disperse via email to the rest of the planning region.

Non-submitting LWDB(s): Complete the remaining sections of the form including LWDB Chair and LWDA CEO signatures and noting that the local board approved the modified WIOA Regional Plan. Once this supplemental form is completed, the LWDB will email this form (in lieu of WIOA Plan Review and Modification Form (Regional Plan)) to the POC along with modified local area plan (if applicable) and other required documentation as referenced in L&I's WIOA Regional and Local Area Plan Guide.

I. WIOA Regional Plan: Designated Submitting Local Workforce Development Board, or LWDB	
Region Name: Click here to enter text.	Submitting LWDB Name (i.e. designated name, not D.B.A.): Click here to enter text.
Local Workforce Development Areas, or LWDAs, that compose the Planning Region: Click here to enter text.	
Name of Region's Designated POC: Click here to enter text.	
Organization: Click here to enter text.	Title: Click here to enter text.
Telephone Number: Click here to enter text.	E-mail Address: Click here to enter text.

II. WIOA Regional Plan Review and Modification Information		
Was the plan reviewed per WIOA and L&I's WIOA Regional and Local Area Plan policy and guide? (yes or no)		
Indicate the economic condition and labor market information source(s) used in the plan review process: <i>List data sources</i>		
Did the plan review warrant plan modifications? (yes or no)		
Was the modified plan draft provided to affected LWDB(s) prior to public posting? (yes or no)		
Have all affected LWDB(s) approved final plan mod: <i>(yes or no)</i>	Public Comment Period: <i>MM/DD/YYYY - MM/DD/YYYY</i>	Comments received: <i>(yes or no)</i>
Non-submitting LWDB Approval Date: <i>MM/DD/YYYY</i>	Plan Modification Effective Date: <i>MM/DD/YYYY</i>	

III. Non-submitting LWDB approves the modified WIOA Regional Plan		
Name of LWDB: Click here to enter text.		
LWDB Executive Director: Click here to enter text.	Signature:	Date: <i>MM/DD/YYYY</i>

IV. Non-submitting LWDB approves the modified WIOA Regional Plan		
Name of LWDB: Click here to enter text.		
Board Chair: Click here to enter text.	Signature:	Date: <i>MM/DD/YYYY</i>

V. Non-submitting LWDA CEO approves the modified WIOA Regional Plan		
Name of LWDA: Click here to enter text.		
CEO: Click here to enter text.	Signature:	Date: <i>MM/DD/YYYY</i>

WIOA Plan Review and Modification Form (Local Area Plan)

A plan modification may be submitted at any time; however, there are certain procedural steps required as part of the modification process. Refer to the PA Department of Labor & Industry's, or L&I, WIOA Regional and Local Area Plan Guide for additional direction.

I. Local Area Plan: Submitting Local Workforce Development Board, or LWDB	
Region Name: Click here to enter text.	LWDB Name (i.e. designated name, not D.B.A.): Click here to enter text.
Name of Designated Point of Contact, or POC: Click here to enter text.	
Organization: Click here to enter text.	Title: Click here to enter text.
Telephone Number: Click here to enter text.	E-mail Address: Click here to enter text.

II. Local Area Plan Review and Modification Information	
Was the local area plan reviewed per WIOA and L&I's WIOA Regional and Local Area Plan policy or guide? (yes or no)	
Indicate the economic condition and labor market information source(s) used in the plan review process: Click here to enter text.	
Did the local area plan review warrant plan modifications? (yes or no)	
L&I will approve continuation of <i>existing</i> structure exemptions when the WIOA local area plan is approved or its modification is approved in lieu of a separate structure exemption request letter.	
Is the LWDB requesting a continuation of an <i>existing</i> structure exemption? (yes or no)	
Was the modified local area plan draft provided to LWDB(s) members prior to public posting? (yes or no)	
Did submitting LWDB membership approve the final local area plan modification: (yes or no)	Public Comment Period: MM/DD/YYYY - MM/DD/YYYY
Comments received: (yes or no)	
Submitting LWDB Approval Date: MM/DD/YYYY	Plan Modification Effective Date: MM/DD/YYYY

III(a). Requested Local Area Plan Changes		
Page #	Change due to a public comment	Describe a change in as few words as possible to direct the reviewer to the marked narrative. Do not describe mechanical or grammatic edits.
#	(yes or no)	Change
#	(yes or no)	Change
#	(yes or no)	Change
#	(yes or no)	Change
#	(yes or no)	Change
<i>If needed, please use supplemental Section III(b). Requested Plan Changes – Continuation Page</i>		

IV. Submitting LWDB Executive Director's Attestation		
Submitter attests LWDA Chief Elected Officer (CEO) and LWDB Chair approved the plan review and/or the submitted plan.		
Name: Click here to enter text.	Signature:	Date: MM/DD/YYYY

V. Submission and Feedback Information (L&I Use Only)	
Date L&I received:	Is plan modification supporting document package complete? Y / N
Date L&I acknowledged:	Has a cursory review been completed, and if needed, acted upon? Y / N
Has the plan mod been reviewed? Y / N	Are the reviewers satisfied with the plan mod? Y / N

VI. BWDA Chief or Policy Coordination Supervisor Recommendation for Approval		
Name: Click here to enter text.	Signature:	Date: MM/DD/YYYY

VII. BWDA Bureau Director's Approval		
Name: Click here to enter text.	Signature:	Date: MM/DD/YYYY

** If no plan modifications are required, provide a copy of this form's page 1 to L&I as evidence that a plan review occurred.*

WIOA Plan Review and Modification Form (Local Area Plan)

WIOA Plan Modification Instructions – Posting, Submission and Technical Support Information

Prior to submitting a modified WIOA Regional or Local Area Plan and its supporting documents for state approval:

- Review the WIOA Regional and Local Area Plan Guidance *Section III Public Comment Period* and *Section IV Plan Submission Requirements and Approval (subsection Plan Submission Requirements, the third and fourth bullet points)* for additional direction.
- The submitting LWDB must address any comments received following the public comment period. In lieu of duplicating any plan changes influenced by public comments within the *submission cover letter*, the LWDB may summarize plan changes due to public comment(s) within this form's *Section III Requested Plan Changes* by denoting any public comment influenced plan change accordingly. Otherwise, the public comment changes must be summarized within the *submission cover letter*.
- Ensure affected LWDB(s) and CEOs duly approved the plan modification as evidenced by signing and dating appropriate supporting documents.
- Modified WIOA plans not documented as being duly approved by the submitting LWDB(s) cannot be approved by the state.

Submitting a WIOA Local Area Plan Modification form for state approval:

- LWDBs submitting a local area plan modification must complete a WIOA Plan Review and Modification Form (Local Area Plan).
 - Sections I-IV must be completed and provided with the modified plan submission package.

Planning Region CEO and LWDB Chair Dated Signatures Supplemental Form (Local Area Plan) Guidance:

- *Single Local Area Regions may disregard this section and form referenced on page 5.*
- Refer to page 5 of this document for complete instructions.
 - Potential local area plan modifications should always be discussed at the Planning Region level to determine overall affect the modified local area plan will have upon the regional plan.
 - This form is provided if the LWDB's local area plan modification is not within the planned two-year modification period.
 - If the LWDB's local area plan modification is deemed to affect the regional plan in a minor manner, this form is used in place of a full Regional Plan modification.
 - If the Planning Region CEO and LWDB Chair Dated Signatures Supplemental Form (Local Area Plan) is employed, then this is the only regional plan modification form required.
 - Once completed, the non-submitting LWDB will email the Planning Region CEO and LWDB Chair Dated Signatures Supplemental Form (Local Area Plan) to the designated POC.

Please direct plan submissions and questions to the BWDA Policy Coordination resource account: RA-LI-BWDA-Policy@pa.gov

WIOA Plan Review and Modification Form (Local Area Plan)

Planning Region CEO and LWDB Chair Dated Signatures Supplemental Form (Local Area Plan)

A plan modification may be submitted at any time; however, there are certain procedural steps required as part of the modification process. Refer to the PA Department of Labor & Industry's, or L&I, WIOA Regional and Local Area Plan Guide for additional direction.

This form is provided if a LWDB's local area plan modification is not within the planned two-year modification period. If the LWDB's local area plan modification is deemed to affect the regional plan in a minor manner, this form is used in place of a full Regional Plan modification.

I. WIOA Regional Plan: Designated Submitting Local Workforce Development Board, or LWDB	
Region Name: Click here to enter text.	Submitting LWDB Name (i.e. designated name, not D.B.A.): Click here to enter text.
Local Workforce Development Areas, or LWDBAs, that compose the Planning Region: Click here to enter text.	
Name of Region's Designated Point of Contact, or POC: Click here to enter text.	
Organization: Click here to enter text.	Title: Click here to enter text.
Telephone Number: Click here to enter text.	E-mail Address: Click here to enter text.

II. WIOA Regional Plan Review and Modification Information		
Was the regional plan reviewed per WIOA and L&I's WIOA Regional and Local Area Plan policy and guide? (yes or no)		
Indicate the economic condition and labor market information source(s) used in the plan review process: Click here to enter text.		
Was the modified regional plan draft provided to affected LWDB(s) prior to public posting? (yes)		
Have all planning region LWDB(s) approved final regional plan mod: (yes or no)	Public Comment Period: MM/DD/YYYY - MM/DD/YYYY	Comments received: (yes or no)
Date of the last LWDB to approve mod: MM/DD/YYYY	Plan Modification Effective Date: MM/DD/YYYY	

III. Requested WIOA Local Area Plan Change(s) That May Affect the Planning Region Plan		
LWDB submitting the local area plan modification (i.e. designated name, not D.B.A.): Click here to enter text.		
Page #	Change due to a public comment	Describe a change in as few words as possible to direct the reviewer to the marked narrative.
#	(yes or no)	Change
#	(yes or no)	Change
#	(yes or no)	Change

IV. LWDB approves the modified WIOA Regional Plan		
Name of LWDB: Click here to enter text.		
LWDB Executive Director:	Signature:	Date:

V. LWDB approves the modified WIOA Regional Plan		
Name of LWDB: Click here to enter text.		
Board Chair:	Signature:	Date:

VI. LWDA CEO approves the modified WIOA Regional Plan		
Name of LWDA: Click here to enter text.		
CEO:	Signature:	Date:

WIOA Plan Review and Modification Form (Local Area Plan)

Planning Region CEO and LWDB Chair Dated Signatures Supplemental Form (Local Area Plan) - Instructions & Technical Support

Background:

- This form is provided if a LWDB's local area plan modification includes narrative that may affect the regional plan and is not within the planned two-year modification period.
- Potential local area plan modifications should always be discussed at the Planning Region level to determine the overall affect local area plan modifications may have on the planning region.
- If the LWDB's local area plan modification is deemed by L&I to provide only a technical or minor affect upon the regional plan, a full regional plan modification that includes posting for public comments is not required. This form is used in place of the more extensive regional plan modification form.

This form is not necessary if:

- The region is composed of a single LWDA.
- The planning region members agree that the LWDB's local area plan modification provides no affect upon the regional plan.
- The LWDB's local area plan modification is deemed to affect the regional plan in a major manner; therefore, a full regional plan modification is required.

Instructions:

- A LWDB's modified local area plan includes narrative that may affect the regional plan and is not within the planned two-year modification period. This LWDB will contact the POC to begin Planning Region discussion.
- POC communicates the LWDB's local area plan modification to all other planning region LWDB(s), arranges meeting(s) for all LWDBs to discuss, and possibly makes minor modification to the regional plan due to the local area plan modification.
- POC provides the modified regional plan draft to L&I's BWDA to determine if the modification is technical or minor.
 - If L&I deems the modification to be technical or minor:*
 - a. the need for posting the draft for public comments may be averted.
 - b. the use of the Planning Region CEO and LWDB Chair Dated Signatures Supplemental Form (Local Area Plan) is warranted.
- The LWDB submitting a local area plan modification does not complete the Planning Region CEO and LWDB Chair Dated Signatures Supplemental Form (Local Area Plan). Instead, the LWDB coordinates with the POC by providing all relevant local area plan modification information.
- POC will complete Sections I, II and III for the benefit of the planning region's LWDA, CEOs and LWDB members.
- Once the POC finalizes the regional plan modifications and prepares the Planning Region CEO and LWDB Chair Dated Signatures Supplemental Form (Local Area Plan), the POC will disperse both items to the rest of planning region via email.
- All remaining LWDB(s) will complete sections IV, V and VI and email the completed Planning Region CEO and LWDB Chair Dated Signatures Supplemental Form (Local Area Plan) to POC.
- POC will email copies of the completed Planning Region CEO and LWDB Chair Dated Signatures Supplemental Form (Local Area Plan) to the LWDB who is submitting the local area plan modification to L&I. The LWDB must attach these forms to the local area plan modification package.
- POC will submit the finalized modified regional plan, including a summary of the technical or minor modifications to L&I.
- POC will ensure the modified regional plan is posted for public viewing.

Please direct plan submissions and questions to the BWDA Policy Coordination resource account: RA-LI-BWDA-Policy@pa.gov