

2018 Combined State Plan Modification Public Comments

Comment	Commenter	Organization	Comment	Agencies	Response	Changes to Plan (if applicable)
1	Rosanne B. Cordelli	Pennsylvania Workforce Development Association (PWDA)	Overall: While overall, we support the strategic vision for workforce development as expressed in the Plan, we believe this document presents an opportunity to further expand Pennsylvania’s workforce and economic competitiveness by affording local workforce boards (LWDBs) additional flexibility needed to prepare skill-specific workers for regionally demanded jobs. PWDA fully supports and facilitates efforts to better align education, business, and workforce development partners to close the skills gap experienced among key industries that drive Pennsylvania’s economy. Equally, we recognize that industry demands for specific worker skills vary from one region or community to the next.	All	Thank you for this comment. The commonwealth appreciates this general comment of support and seeks to balance local control and flexibility with ensuring the goals of the Combined State Plan are met.	N/A
2	Rosanne B. Cordelli	Pennsylvania Workforce Development Association (PWDA)	Career Readiness Definition: Basing policy on a uniform definition of career readiness is a significant endeavor with wide-sweeping consequences across many initiatives. We feel strongly that local workforce development boards and business partners should be deliberately included in the process, as their feedback will be important to ensuring the common definition aligns with local hiring perspectives.	L&I, PDE	Thank you for this comment. The commonwealth will work with, to the greatest extent possible, local workforce development system and other partners to adopt a definition of career readiness across WIOA partner programs.	N/A
3	Rosanne B. Cordelli	Pennsylvania Workforce Development Association (PWDA)	Training Targets: We believe the State Plan-imposed training expenditure target percentages are seemingly arbitrary at this point of WIOA implementation. Frankly, these percentage targets artificially inhibit the flexibility business-driven workforce boards need to satisfy the pipeline of workers skilled for available local jobs. While we recognize the spirit and intent of WIOA to provide services to low-income individuals with barriers to employment, we believe the current blanket-coverage training expenditure targets (30%/50%) hold captive a pool of funding that could more accurately reflect what is needed on a community-by-community basis commensurate with the local economic climate and market conditions. Given	L&I	Thank you for this comment. The commonwealth established the training target benchmark to increase credential attainment for Pennsylvania's workforce, especially those facing barriers to employment during times of low unemployment, and focuses on quality outcomes that lead to greater skills attainment or competency. The training target benchmarks from the original Combined State Plan were revised in the Combined State Plan Modification. The new training target benchmark is set at 30% and is calculated using the allocation totals of	N/A

			<p>that WIOA regional plans are required to include strategies for collaborating with economic development and employer partners (State Plan, p. 15), we believe each local area requires the flexibility necessary to satisfy this intent. Several contiguous states – Ohio, New York, and Maryland – do not impose these arbitrary targets, arguably giving neighboring states a competitive edge in this regard.</p> <ul style="list-style-type: none"> • <u>Overall Targets</u>: Mandatory spending percentages are restrictive and limit local flexibility. • <u>Youth</u>: Designated populations, such as youth, need customized service to support their employment and training plan. Training benchmarks should not apply to WIOA Youth programs. WIOA youth participants have significantly different needs than adult and dislocated workers, not all of who can be served through training. Prescriptive thresholds for funding allocation would be particularly detrimental for youth programs, where elements such as adult mentoring, training, and follow-up are both time-and-cost- intensive, and are vital to the success of youth participants. • <u>Dislocated Workers</u>: Training benchmarks should not apply to Dislocated Worker programs. Dislocated Workers commonly already possess in-demand skills and benefit from employment and job placement services that allow them to reenter the workforce quickly, rather than devoting longer periods of time to training. • <u>Trade/TRA funding</u>: PWDA would like to see Trade Readjustment Allowance (TRA) funding to be clearly listed as counting toward the 30% target. 		<p>Adult and Dislocated Worker formula funding. Youth funding is not included in this calculation. At least 50% of funds used toward achieving the 30% benchmark must be used to serve people with barriers to employment.</p> <p>Pass-through funds to Local Areas will count toward meeting the training target benchmark. Since Trade/TRA funds are not directly passed-through to Local Areas, they do not count toward meeting the training target benchmark.</p>	
4	Rosanne B. Cordelli	Pennsylvania Workforce Development Association (PWDA)	<p>Next Generation Sector Partnerships: PWDA supports the governor’s efforts to promote and develop Next Generation Sector Partnerships. In an effort to promote the Next Generation model, we believe the commonwealth should also consider expanding opportunities for local areas to adapt existing Industry Partnership programs to align more closely with the Next Generation model, in addition to</p>	L&I, DCED	Thank you for this comment. The commonwealth will continue to support Industry Partnerships transitioning into Next Generation Sector Partnerships.	N/A

			<p>supporting the start of new Next Generation Sector Partnerships.</p> <p>Further, we believe it is imperative that LWDBs are given the flexibility to implement certain strategies, such as grandfathering in previously designated sectors, so customized sectors can be formulated according to local needs.</p>			
5	Rosanne B. Cordelli	Pennsylvania Workforce Development Association (PWDA)	<p>Work-based Learning Opportunities for Youth: Many of the local workforce development boards with large EARN programs have available earned performance funds that could be used to expand young adult programs beyond what can be supported with Title I Youth or TANF-Youth funding. However, the PA Department of Human Services changed its policy three years ago and no longer allows the use of EARN performance funds for low-income (Non-TANF) youth and young adults. PWDA believes there should be an alignment between a revised/reverted DHS policy that reflects and supports this Plan’s Goal 3. DHS has developed draft policies that would increase the age range for low-income youth to be expanded to include young adults aged 19-24 for TANF-Youth funds. We believe this strategy could be finalized and included in the final State Plan Modification.</p> <p>We believe LWDBs should be allowed to be “inclusive” with EARN performance dollars to serve all low-income youth, not just TANF youth and young adults. Expanding services by allowing already earned performance dollars would be a positive, pre-emptive strike at getting that at-risk population started in the right direction.</p>	L&I, DHS	Thank you for this comment. The commonwealth is exploring EARN program changes to allow for funding innovative practices in addressing barriers to success. The commonwealth is also exploring changes which would permit TANF-Youth funds to serve a lower age range. In 2017, none of the system vendors responding to surveys of the EARN system identified that service youth are a barrier to success.	N/A

6	Rosanne B. Cordelli	Pennsylvania Workforce Development Association (PWDA)	<p>Career and Technical Education, and Career Pathways: PWDA notes the removal of this language from the initial Plan: "The Departments of Education and Labor & Industry will work cooperatively to explore and develop appropriate connections between WIOA youth activities and Perkins postsecondary and state-funded programming. The Department of Education (PDE) will make additional funds available to support the transformation and modernization of career and technical education (CTE) and align CTE with the career pathways recognized by the commonwealth."</p> <p>We also note the above-italicized text has been substituted with this language in the (Modified) Plan: "The Department of Education (PDE) will explore opportunities to support the transformation and modernization of secondary and postsecondary career and technical education (CTE) and promote aligned career pathways."</p> <p>Recognizing the value of secondary and post-secondary career and technical education programs in connecting individuals with in-demand skills and credential attainment along career pathways, PWDA supports and encourages expressed continued investment from the Departments of Education and Labor & Industry into career and technical education programming. We prefer the original Plan's language.</p>	PDE	Thank you for this comment. The commonwealth agrees that cross-sector, inter-agency collaboration is critical to ensure that students' learning experiences help foster skills that prepare them for success in the workforce. Pennsylvania's career and technical education (CTE) programs are overseen by the Department of Education, but rely on input from a variety of local, regional, and state partners, including the Department of Labor & Industry. By broadening the language in the revised State Plan to reflect the full continuum of CTE programs, the commonwealth aimed to enhance, not limit, these collaborative efforts.	N/A
---	---------------------	---	--	-----	--	-----

7	Rosanne B. Cordelli	Pennsylvania Workforce Development Association (PWDA)	<p>Job Quality:</p> <ul style="list-style-type: none"> • <u>Unclear definition:</u> The definition of “job quality” differs significantly by local area, based on labor market information, cost of living, self-sufficiency wage, etc. PWDA recommends that the commonwealth allow this definition to be set locally. • <u>Potential conflict with Priority of Service benchmark:</u> Employer engagement focusing on high-quality jobs may present a challenge when also directing services to 70 percent priority of service individuals. These individuals with barriers to employment may instead benefit more from entry-level positions along a career pathway that leads to higher-quality jobs. To support the governor’s goal of developing viable career pathways, PWDA recommends that the commonwealth’s emphasis on job quality also allow for the placement of individuals in entry-level positions along a pathway to higher-quality jobs. 	L&I	<p>Thank you for this comment. The commonwealth agrees that the definition of "job quality" varies and recognizes the value that entry-level opportunities create. The commonwealth will work with local partners to create a definition of job quality.</p> <p>The commonwealth appreciates you identifying the potential conflict in guidance regarding different Priority of Service benchmarks identified in the draft Combined State Plan Modification and Workforce System Policy (WSP) 05-2015, <i>Priority of Service – Initial Implementation of the Workforce Innovation and Opportunity Act (WIOA)</i>. The commonwealth supports the 51% Priority of Service benchmark and will incorporate this change in the final Combined State Plan Modification. The commonwealth will also work with local partners to develop workforce initiatives that provide opportunities along varying stages of career pathways.</p> <p>The commonwealth will review and revise all policies to ensure compliance with the final Combined State Plan.</p>	The final Combined State Plan Modification was updated to reflect a 51% Priority of Service benchmark.
8	Rosanne B. Cordelli	Pennsylvania Workforce Development Association (PWDA)	<p>Funding for Industry Partnerships: PWDA proposes that language be included to state that all Next Generation Industry Partnership funding where the LWDB serves as the fiscal agent may be counted toward the 30 percent/50 percent training benchmarks.</p>	L&I	Thank you for this comment. The commonwealth currently allows for Next Generation Industry Partnership funding to count toward the training target benchmarks.	N/A

9	Rosanne B. Cordelli	Pennsylvania Workforce Development Association (PWDA)	<p>State Board Membership: PWDA believes that when those who implement policies are included in the planning process, e.g., LWDBs, implementation is more efficient and effective and enables LWDB staff to offer valuable “boots-on-the-ground” input to avoid delays in service and optimal use of resources – both fiscal and human.</p> <p>PWDA would formally request, therefore, that LWDB members be identified among those seated on the State Board in this (Modified) Plan.</p>	L&I, PA WDB	Thank you for this comment. The commonwealth will explore ways to further engage Local Boards in the workforce development policy planning process, including the whether a Local Board member should serve on the PA Workforce Development Board.	N/A
10	Rosanne B. Cordelli	Pennsylvania Workforce Development Association (PWDA)	<p>Program Data: PWDA believes that where possible under state regulations, disaggregated data from these records should also be shared with local areas. Local access to this data, which provides a more real-time assessment of program outcomes, is needed to fully understand the impact of systemic efforts across programs, thus improving accountability of all programs in meeting the governor’s goals. Access to this data would also be particularly beneficial for youth programming, as youth clients tend to be more ephemerally tied to the system; the additional burden of retention measures will be an administrative challenge for youth programs.</p> <p>Additionally, PADataShare appears to be a new system. Additional information about this system and how it will function would be appreciated by the PWDA membership.</p>	L&I	Thank you for this comment. The commonwealth is committed to sharing with local partners as much localized and detailed data as allowed by law, and will continually assess local needs.	N/A
11	Rosanne B. Cordelli	Pennsylvania Workforce Development Association (PWDA)	<p>Priority of Service: PWDA favors the (Modified) Plan language indicating that the benchmark only applies to Title I Adult participants. However, we would call attention to the following:</p> <ul style="list-style-type: none"> <u>Data access needs:</u> To support LWDBs in meeting these percentage targets, PWDA believes the commonwealth should allow LWDBs and PA CareerLink® staff access to COMPASS Data that would help streamline the process for determining eligibility for priority service. In addition, the commonwealth should provide LWDBs and PA CareerLink® staff with a listing of public 	L&I	<p>Thank you for this comment. The commonwealth is exploring a data sharing agreement which would improve the ability of local boards to ensure effective outreach to and identification of Priority of Service individuals, within the requirements of federal and state statute and/or policy.</p> <p>The commonwealth appreciates you identifying the potential conflict in guidance regarding different Priority of Service benchmarks identified in the draft</p>	The final Combined State Plan Modification was updated to reflect a 51% Priority of Service benchmark.

			<p>assistance recipients to enable better targeting and outreach of priority-of-service individuals.</p> <ul style="list-style-type: none"> • <u>Conflicts with prior guidance</u>: The “70 percent” priority-of-service requirement outlined in the Plan does not align with prior information provided by the commonwealth in Workforce System Policy No. 05-2015 (December 23, 2015), which states: “The goal for each area is to serve a greater percentage of Adult customers from priority targeted groups than all other individuals (at least 51 percent of Adult participants from priority groups).” PWDA recommends that this benchmark be clarified and set at 51 percent. The 51 percent level is less restrictive and enables LWDBs to tailor dollars to needs on a month-to-month/quarter-to-quarter basis that reflects the local economy. Most job seekers in this economy are low-income, skills-deficient, so following WIOA is being accomplished. • <u>Serving employers</u>: Setting a high benchmark for serving priority-of-service individuals may present a challenge for servicing employers. This could potentially impact outcome levels for the measure “Effectiveness in Serving Employers.” 		<p>Combined State Plan Modification and Workforce System Policy (WSP) 05-2015, <i>Priority of Service – Initial Implementation of the Workforce Innovation and Opportunity Act (WIOA)</i>. The commonwealth supports the 51% Priority of Service benchmark and will incorporate this change in the final Combined State Plan Modification.</p> <p>The commonwealth will review and revise all policies to ensure compliance with the final Combined State Plan.</p>	
12	Rosanne B. Cordelli	Pennsylvania Workforce Development Association (PWDA)	<p>Rapid Response: PWDA believes LWDBs should be encouraged to use Rapid Response funds to support incumbent worker training, accordingly. These dollars should continue to support lay-off aversion. Incumbent worker training, especially for entry-level roles, is critical to encouraging employers to upskill and promote from within.</p>	L&I	Thank you for this comment. The commonwealth will continue to explore the potential for expanded use of Rapid Response funds.	N/A
13	Dillon Moore	Partner4Work	<p>Training Targets:</p> <ul style="list-style-type: none"> • <u>Youth</u>: Training benchmarks should not apply to WIOA Youth programs. WIOA youth participants have significantly different needs than adult and dislocated workers, not all of which can be served through training. Prescriptive thresholds for funding allocation would be particularly detrimental for youth programs, where elements like adult mentoring and training and 	L&I	Thank you for this comment. Please see response to PWDA Comment 3.	The final Combined State Plan Modification was updated to state 50% of training funds “are required”

			<p>follow up are both time and cost intensive and vital to the success of youth participants. Further, 20 percent of WIOA Youth funds are already required to be spent on providing work experience opportunities to youth.</p> <ul style="list-style-type: none"> • <u>Dislocated Workers</u>: Training benchmarks should not apply to Dislocated Worker programs. Dislocated Workers commonly already possess in-demand skills and benefit from employment and job placement services that allow them to reenter the workforce quickly rather than devoting longer periods of time to training. • <u>Potential Typo</u>: The plan says 50% of funds were required to be spent on low income individuals and individuals with other barriers. This should probably be edited to say “are required”. 			to be spent on low income individuals and individuals with other barriers to employment.
14	Dillon Moore	Partner4Work	<p>Career Readiness Definition: Engage LWDBs and Businesses. This is a significant endeavor. Local boards and employers should be included in the process, as their feedback will be important to ensuring the common definition aligns with the local perspective of hiring employers.</p>	L&I, PDE	Thank you for this comment. Please see response to PWDA Comment 2.	N/A
15	Dillon Moore	Partner4Work	<p>Next Generation Sector Partnerships: Partner4Work supports the Governor’s efforts to promote and develop Next Generation Sector Partnerships. In an effort to promote the Next Generation model, the commonwealth should also consider expanding opportunities for local areas to adapt existing industry partnership programs to align more closely with the Next Generation model in addition to supporting the start of new Next Generation Sector Partnerships.</p>	L&I, DCED	Thank you for this comment. Please see response to PWDA Comment 4.	N/A

16	Dillon Moore	Partner4Work	<p>Job Quality:</p> <ul style="list-style-type: none"> • <u>Unclear Definition:</u> The definition of “job quality” differs significantly by local area, based on labor market information, cost of living, self-sufficiency wage, etc. Partner4Work recommends that the commonwealth allow flexibility for this definition to be set locally. • <u>Potential Conflict with Priority of Service Benchmark:</u> Employer engagement focusing on high quality jobs may present a challenge when also directing services to 70% priority of service individuals. These individuals with barriers to employment may instead benefit more from entry-level positions along a career pathway leading to higher quality positions. To support the Governor’s goal of developing viable career pathways, Partner4Work recommends that the commonwealth’s emphasis on job quality, also allow for the placement of individuals in entry-level positions along a pathway to higher quality jobs. 	L&I	Thank you for this comment. Please see response to PWDA Comment 7.	The final Combined State Plan Modification was updated to reflect a 51% Priority of Service benchmark.
17	Dillon Moore	Partner4Work	<p>Wage Data:</p> <ul style="list-style-type: none"> • Where possible under PA regulations, disaggregated data from these records should also be shared with local areas. Local access to these data, which provides a more real-time assessment of program outcomes, is needed to fully understand the impact of systemic efforts across programs, improving accountability of all programs in meeting the Governor’s goals. Access to these data would also be particularly beneficial for youth programming, as youth clients tend to be more ephemerally tied to the system and the additional burden of retention measures will be an administrative challenge for youth programs. • PADataShare appears to be a new system. Additional information on this system and how it will function would be appreciated. 	L&I	Thank you for this comment. Please see response to PWDA Comment 10.	N/A

18	Dillon Moore	Partner4Work	<p>Priority of Service:</p> <ul style="list-style-type: none"> • <u>Data Access Needs:</u> To support LWDBs in meeting these percentage targets, the commonwealth should allow LWDBs and PA CareerLink staff access to COMPASS Data that would help streamline the process for determining eligibility for priority service. In addition, the commonwealth should provide LWDBs and PA CareerLink staff with a list public assistance recipients that would enable more effective outreach to priority of service individuals. • <u>Conflicts with Prior Guidance:</u> The “70 percent” priority of service requirement outlined in the state plan does not align with prior information provided by the commonwealth in Workforce System Policy No. 05N2015 (December 23rd, 2015), which states: “The goal for each area is to serve a greater percentage of Adult customers from priority targeted groups than all other individuals (at least 51% of Adult participants from priority groups).” Partner4Work recommends that this benchmark be clarified and set at 51%. • <u>Serving Employers:</u> Setting a high benchmark for serving priority of service individuals may present a challenge for also serving employers. It will likely take more time to serve populations with the greatest barriers to employment, which will thereby take additional time to meet the service needs of employers. This could potentially impact outcome levels for the measure “Effectiveness in Serving Employers”. 	L&I	Thank you for this comment. Please see response to PWDA Comment 11.	The final Combined State Plan Modification was updated to reflect a 51% Priority of Service benchmark.
17	Dillon Moore	Partner4Work	<p>Career and Technical Education, and Career Pathways: Recognizing the value of secondary and post-secondary CTE programs in connecting individuals with in-demand skills and credential attainment along career pathways, Partner4Work supports and encourages continued investment from L&I and PDE into career and technical education programming.</p>	L&I, PDE	Thank you for this comment. Please see response to PWDA Comment 6.	N/A

18	Rick Bugbee	Associates for Training and Development (A4TD)	Projections for Jobs in Industries and Occupations with Employment Opportunities for Older Workers: This section discusses one occupation, School and Employee Bus Transportation, which employs high percentages of older workers and is expected to grow 2012-2022. Other industries could be included in this discussion; healthcare, retail sales, customer service, food preparation and service, etc. All of these occupations are also high priority, and in our experience are more attractive to mature workers than bus driver jobs.	PDA	Thank you for this comment. The commonwealth appreciates the recommendation, but Appendix VII of the Plan includes a more comprehensive list of occupations attractive to mature workers. The School and Employee Bus Transportation occupation is one example occupation from Appendix VII in the narrative.	N/A
19	Rick Bugbee	Associates for Training and Development (A4TD)	Coordination between AAA's and SCSEP: language could be added about the type of coordination that occurs between AAA's and other SCSEP administrators. Cross-referrals, sharing of meeting space, promotion of partner activities, sharing technology, etc. are common ways that we collaborates on a regular basis	PDA	Thank you for this comment. The commonwealth appreciates the ongoing collaboration between the 52 Area Agencies on Aging and SCSEP administrators.	N/A
20	Rick Bugbee	Associates for Training and Development (A4TD)	Focus on High Priority Occupations: Includes a concise explanation of how we allow High Priority Occupations to guide how we train participants. We could also detail how we explain this concept to incoming applicants, and advise them about which jobs are in demand so they can make smart decisions about selecting realistic occupational goals. At the time of application, comprehensive assessments are conducted that identify applicant aptitudes and abilities. Assessment results guide the decision making process as we assign and train.	L&I, PDA	Thank you for this comment. The commonwealth believes the Combined State Plan has the right level of detail on this topic.	N/A
21	Rick Bugbee	Associates for Training and Development (A4TD)	Selecting Host Agency Partners: The description of how we select Host Agency partners could be strengthened. We prioritize those site that can provide quality training in High Priority Occupations; those who provide meaningful support in the job search process; those that have the potential to hire participants; those that can provide training in multiple areas; etc.	PDA	Thank you for this comment. The commonwealth supports this recommendation and will incorporate this recommendation in the final Combined State Plan Modification.	The final Combined State Plan Modification was updated to provide more information on how SCSEP selects Host Agency partners.

22	Rick Bugbee	Associates for Training and Development (A4TD)	<p>Focus on High Priority Occupations: Includes a discussion of efforts to provide Direct Care Worker training in response to High Priority Occupations. Other credentials should be discussed including Personal Care Aide, Certified Nurse Assistant, Pharmacy Technician, ServSafe Food Management certificate, computer training, etc. This could also be included in the training section on pg 293, which could add additional content about the computer training of participants.</p>	L&I, PDA	<p>Thank you for this comment. The commonwealth considers Personal Care Aides, Certified Nurse Assistants, and Home Health Aides as Direct Care Workers. Basic computer training is provided to all SCSEP participants since basic computer proficiency is a prerequisite for many jobs. The commonwealth will consider expanding to include other examples that fall within High Priority Occupations.</p>	N/A
----	-------------	--	--	----------	---	-----