

Public Comments

The draft Workforce Innovation and Opportunity Act (WIOA) Combined State Plan was posted on the Pennsylvania Workforce Development Board's webpage for public comment from December 28, 2015, through February 1, 2016. Stakeholders and the general public were notified of the posting of the plan and the opportunity to provide comment. The following pages capture each comment as submitted and a response. The commonwealth will continue to reference the comments as we implement the Workforce Innovation and Opportunity Act.

Corrine Dietrich of **Abilities in Motion** commented: While reading the WIOA Combined State Plan, it is apparent the state is still looking to keep the partnerships they currently have, and not seeking to expand their partnerships. Currently, if a person with a disability comes to a local Careerlink and discloses a disability, they are automatically referred to Office of Vocational Rehabilitation (OVR). Many times, the person referred is denied OVR services because they do not meet the requirements for Order of Selection. This creates a vicious circle where the person with a disability falls through the cracks of these systems.

This new plan continues with the same concept when Careerlinks and other partners are missing two valuable resources that can help a person with a disability: Centers for Independent Living (CIL), and also Employment Networks. CILs offer a plethora of learning opportunities for people with disabilities. They offer four core services (information and referral, advocacy, peer counseling, and independent living skills training). CILs can help people with disabilities overcome barriers that are preventing them from focusing on employment (transportation, insurance, etc.) this will allow OVR counselors to focus on career related needs. CILs can also help those who do not qualify for OVR services. Employment Networks under the Ticket to Work Program can also help. Employment Networks were created to give people with disabilities on Social Security benefits more options. Many Employment Networks assist individuals who don't qualify for OVR services. There are many individuals with disabilities who do not meet the specifications for Order of Selection. Employment Networks can be another resource available to the partnerships the plan discusses. Employment Networks can also offer a "hand off" opportunity for OVR clients receiving Social Security Benefits. This means individuals who have successful case closure can be referred to Employment Networks to continue assisting them with their employment goals and continue working towards self-sufficiency.

The state has many great opportunities to help people obtain work and/or return to work. As with anything, there is always room for improvement. With the Employment First Initiative, it is more apparent now than ever to have as many resources in place to help those with disabilities seeking competitive and integrated employment.

Response: We appreciate the comment in support of the plan and acknowledge the valuable resources available for individuals with a disability from partners such as Centers for Independent Living (CILs) and Employment Networks.

AHEDD offered multiple comments to include:

- Thank you for the opportunity to submit our thoughts and suggestions regarding the State Plan. This is a great first draft and embodies significant changes that are a positive for people within our state and nation!

Response: We appreciate the overall sentiment.

- There is no mention of PA Business Leadership Network (PA BLN) while there are many programs and partnerships mentioned by name and many references to OVR's commitment to business partners. OVR's SPOC model is highlighted and other resources and collaborations are only alluded to on page 140.

In response to the business community's needs for a diverse set of qualified workers to fill its labor needs, meet its compliance requirements, and respond effectively to the needs of its diverse customers, AHEDD began coordinating a statewide business initiative, The Pennsylvania Business Leadership Network (PA BLN), in 2000. The PA BLN is part of a national initiative which began in 1994 and that includes approximately 50 BLN affiliates throughout the country. The national effort is now led by the USBLN (<http://usbln.org/>) which has the support of a number of corporate partners.

The PA BLN describes itself an employer-driven program designed for business leaders to promote hiring practices that enable qualified people with disabilities to enter and succeed in the workplace. The key approach of this network is to provide companies with a 'business friendly' approach that focuses mostly on getting employers to talk with each other, peer-to-peer.

As described in the HOW TO GUIDE (<http://www.portal.state.pa.us/portal/server.pt?open=18&objID=1376016&mode=2&externalurl=http://www.padesummit.org>) that was produced with federal funds from the Centers for Medicare and Medicaid Services (CMS) Medicaid Infrastructure Grant (CFDA # 93.768), the PA BLN offers business a private and alternate path for learning about, starting, and expanding their strategies to increase the diversity and inclusion in both their workplace and marketplace.

As a statewide initiative of a private, non-profit organization, the PA BLN can demystify the available resources, both public and private, in the Commonwealth and offer businesses ideas and connections for flexible and creative solutions that meet the varied logistics and nuances found in each industry/workplace. The PA BLN specifically offers employers: access to pertinent disability related information; a network of employers who can share experiences and best practices; exposure to qualified job applicants with disabilities; training on disability related resources, strategies, etiquette, and more; and opportunities for positive public relations to promote a "disability friendly" status.

Response: We accept the comment and have amended the plan to include mention of the Pennsylvania Business Leadership Network on page 139.

- Goal 1.5: The commonwealth will mainstream job seekers with barriers to employment to the maximum extent possible....by ensuring necessary supportive services are in place and coordinated across agencies, so that those individuals with the most significant barriers to employment are successful..... How will the system identify people with disabilities and ensure they are served throughout? During the WIA era, there was a lot of criticism directed towards the One Stop System in PA and nationwide for ineffective efforts at serving persons with disabilities. The frequent complaint was that the one stop system, if it served a person with a disability, saw the state vocational rehabilitation agency as the exclusive option. There were also

concerns with the inability of this system to track how many people with disabilities it actually served. A review of the state plan suggests that this will continue with WIOA with a heavy handed reliance on the PA OVR.

Response: WIOA strengthens the foundation for the establishment of a comprehensive, accessible, and high-quality workforce development system that serves all individuals in need of education and employment services, including individuals with disabilities, and employers in a manner that is customer-focused and that supports an integrated service delivery model. In addition to the indicators of performance for activities provided by the core programs, Title IV of the Rehab Act Section 414 State Plan requires the number of individuals referred to State VR programs (OVR) by one-stop operators (as defined in section 3 of WIOA), and the number of individuals referred to such one-stop operators by State VR programs. The CWDS tracking and reporting of individuals referred and served by these programs will help identify areas of need for improved collaboration to adequately serve individuals with disabilities through the PA CareerLink® system.

- With over 725,000 working aged adults and 75,000 youth with disabilities, PA has an ever growing caseload of residents receiving disability related benefits from the Social Security Administration (SSA). Since 2001, SSA has operated two distinct programs in every state to promote and facilitate employment and increased earnings among individuals with disabilities who are otherwise dependent on government benefits. These programs include Work Incentives Planning Assistance (WIPA) and Ticket to Work. It is unfortunate that the PA WIOA state plan has not identified SSA beneficiaries as a targeted demographic group, reflecting a perspective that this group of people do not warrant consideration within the PA workforce system. • Furthermore, the plan's lack of inclusion of SSA's WIPA and Ticket to Work initiatives is a lost opportunity to harness technical expertise and commitment of organizations to serve this population. Giving people options for how to get service and helping them to understand how work will impact their benefits are often key elements in the decision to work. We need this expertise included to incentivize employment for people with disabilities or they may not attempt work or remain in the workplace at their fullest potential.

Response: We appreciate the comment. The commonwealth will continue to focus efforts on those with barriers to employment, including individuals with disabilities as defined in WIOA. Additionally, the Department of Human Services (DHS) agrees that people with a disability receiving DHS-funded Medicaid waiver home and community-based supports often cite as a barrier to seeking employment the concern that earning wages will make them ineligible for basic supports that enable them to live independently in the community rather than a more costly institutional setting. DHS is exploring adding benefits counseling (Work Incentives Planning Assistance) as a service that would be paid under its Medicaid HCBS waivers.

- OJTs Versus Job Coaching- OJTs are promoted and details about OJT strategies are listed on pages 81, 88, 135, 145. OJTs can be used for youth summer employment or for 30 days of employment for persons of any age. Going forward, we were hoping to see more flexibility in the use of these OJTs with Supported Employment (SE). Typically if OJTs are utilized to incentivize placement with an employer, the provision of job coaching support is no longer an option. In light of OVR's "dual customer model" (page 140), it would be great for strategies to allow for some combination of these services.

Response: We appreciate the comment. OVR offers business solutions and supports such as OJTs and Job Coaching to assist individuals with disabilities to achieve competitive integrated employment. On an individual basis, these services may be provided in combination to help ensure successful placement.

- Will funding for training programs be specific for high-priority jobs that pay? Unless we missed it, this priority for spending of funds was not clear in the plan.

Response: As outlined in the draft state plan, work-based training will generally be aligned with the PA High Priority Occupation list to ensure that jobs are in-demand, have higher skill needs and are likely to result in family-sustaining wages.

- Is Partnership Plus still an option? There are many great notes on collaboration with other funding streams and planning for extended services, but there is no mention of Partnership Plus. Will there still be the opportunity transfer an individual's Ticket (under SSA's Ticket to Work) for those that wish to get extended services from another Employment Network (EN)? Will OVR extended services affect those participating in this program? (Most specific, page 160)

Response: OVR encourages the use and leverage of available sources of extended service funding. Yes, Partnership Plus is still an option. OVR opens cases consistent with statutes, regulations and policy. OVR explains the Ticket to Work and Partnership Plus process with each customer determined eligible for Vocational Rehabilitation (VR) services under the Ticket to Work Program at the time of application, during development of the Individual Plan for Employment (IPE), during the job development process, and at closure. Under Ticket to Work regulations, Partnership Plus paved the way for Employment Networks and VRs to collaborate as opposed to compete when serving Social Security beneficiaries. OVR customers are advised that Partnership Plus allows a beneficiary to receive OVR services to meet his or her intensive up-front service needs and, after the OVR case is closed, to work with an EN to receive job retention services. The goal is to increase employment retention and promote the highest level of self-sufficiency possible.

- Page 11- 2.6- Job readiness and soft skill credentials- How can this help a job applicant?

Response: Recent surveys of employers show that the greatest deficiencies among new entrants to the workforce and workers with employment barriers are not in their technical or "hard skills," but rather their interpersonal abilities and personal qualities, called "soft skills." Knowing how to use a cash register's functions is a hard skill, for example, while communicating well with customers during checkout is a soft skill. Other soft skills include organizing, teamwork, flexibility, problem solving, multicultural sensitivity, and leadership, to name just a few.

- Page 12- 2.10- It is positive that Employment First is noted up front in the goals... especially as there are a lot of mentions of training programs in this plan.

Response: We appreciate the comment.

- Page 12- (Bottom of page) - It would be preferred that "youth" be defined as a broader group...instead of just 16-24 years old. If health insurance allows coverage until age 26, perhaps this definition could broaden to include those from 16-26.....or maybe even 30 years old.

Response: The definition of youth is prescribed by WIOA. The commonwealth has no discretion in that regard.

- Page 14- 3.9- How many people were served by Allegheny County's Learn and Earn program? (WorkReady Philadelphia is noted as serving 529 youth)

Response: The Allegheny County program served 400 youth.

- Page 15-3.12- D.R.E.A.M. Partnership- Plan wording/goals should ensure that any such program to increase post-secondary education should demonstrate that the program leads to High Priority Occupations. This is also discussed on pages 147-148.

Response: We appreciate the comment.

- Page 18- 5.3- Expanding/revamping CWDS, especially to work with other systems, will be helpful. There should also be ways for private providers to securely share info within the workforce development system.

Response: The commonwealth is committed to providing access to data in a manner consistent with the statutes, regulations, and policies governing its release.

- Page 47 - Business Service Team information. SPOC emphasized. We would love to hear more about the ideas for supporting this plan.

Response: The VR Services Portion under the "Coordination with Employers" section of the State Plan describes OVR's business engagement strategies and best practices for employer outreach.

- Page 50- (bottom of page) - Training programs that are designed to meet local labor market demand. How will this data be tracked?

Response: Strategies will be informed by robust labor market information gathered, analyzed and provided by Labor & Industry's Center for Workforce Information and Analysis (CWIA) and other sources.

- Page 84- Very specific and thoughtful strategies for reaching OSY.

Response: We appreciate the comment.

- Page 116- (also page 118) - Vague transition policy information. Waiting on final regulations.

Response: We await the release of final regulations anticipated to be issued in June 2016.

- Page 120- Coordination with Employers- "Where possible, OVR will coordinate business outreach with other workforce and economic development partners, including Industry Partnerships and other multi-employer workforce partnerships." This is a prime place to plan for

partnership with the PA Business Leadership Network, Chambers, SHRM's, and other possible business organizations. We would love to see flexibility and ease for such business organizations to receive grants for such business-to-business outreach and program implementation.

Response: We appreciate the comment supporting continued collaboration and partnership across workforce development system programs.

- Page 132 - "The materials appropriately identify OVR as the single-point-of-contact for employers who want to meet their workforce needs by hiring people with disabilities. This will build on the employer manual and encourage local team approaches to working with employers. The teams include representatives from OVR, local PDE agencies, and DHS-funded county-based human service agencies to support people with disabilities in securing employment and meeting the related needs of the employers." – What about the PA Business Leadership Network and its inclusion as a private option in the HOW TO GUIDE that is on the State Portal...
<http://www.portal.state.pa.us/portal/server.pt?open=18&objID=1376016&mode=2&externalurl=http://www.padesummit.org>

Response: OVR commits to ongoing collaboration and partnership with the PA Business Leadership Network (PA BLN) as part of its business engagement strategy that helps to promote an inclusive workforce. The plan was edited to include the PA BLN on page 139.

- Page 133- Plans for HGA- 2-A- analysis of current programs. This is good.

Response: We appreciate the comment.

- Page 143- Outreach to educational agencies, mention of developing alternate service delivery models for individuals with significant disabilities who may have traditionally entered into subminimum wage employment. This is good.

Response: We appreciate the comment in support of the development of alternative service delivery models. PDE will continue to collaborate with OVR/DHS by informing OVR of IEP meetings and inviting their participation in planning for students with disabilities, and will collaborate with OVR to develop a training strategy for school-based IEP teams related to secondary and postsecondary work, including integrated employment and educational opportunities.

- Page 145- More OJT information. This is good, but we cannot tell if the models allow for use with Supported Employment services/job coaching. Less than 100% of wages OR a shorter time frame might allow more participants/employers to benefit.

Response: We appreciate the comment. OVR will continue to promote and offer business solutions and supports such as OJTs and Job Coaching to assist individuals with disabilities to achieve competitive integrated employment. On an individual basis, these services may be provided in combination to help ensure successful placement. OVR is currently offering a 100% On the Job Training contract for employers for the first 30 days, as well as a 100% Jobs for All

OJT reimbursement for students with disabilities for summer, seasonal, part-time, or internship opportunities.

- Page 146- Do you need to have a Project Search model to reach students with support from OVR? A lot of emphasis is placed on Project Search, D.R.E.A.M. Partnership, OJTs. Will OVR still support traditional job development/placement and coaching for youth? Assessments?

Response: Updates in the Rehabilitation Act of 1973 as amended in WIOA prioritize “Pre-Employment Transition Services” (P.E.T.S.) for students with disabilities ages 14 -21. The following are the required activities under PETS: Career Exploration Counseling; Work-Based Learning Experiences; Counseling on Post-Secondary Training and Education Opportunities; Workplace Readiness Training; and Self-Advocacy Training, including Peer Mentoring. OVR continues to offer assessments, OJT, and job coaching supports for youth.

- Page 151- It would be nice if more data was shared. Also: “Overall, SE services are the most effective cost service used by OVR.” Something to consider with regards to funding training programs...

Response: We appreciate the comment and recommendation to provide more data with regards to evaluating the cost-effectiveness and structure of current Supported Employment programs.

- Page 154- Public awareness and outreach strategy- this is good for everyone.

Response: We agree and appreciate the comment.

- Page 159- 160- Extended services in SE. No mention of Partnership Plus

Response: OVR opens cases consistent with statutes, regulations and policy. OVR explains the Ticket to Work and Partnership Plus process with each customer determined eligible for Vocational Rehabilitation (VR) services under the Ticket to Work Program at the time of application, during development of the Individual Plan for Employment (IPE), during the job development process, and at closure. OVR customers are advised that Partnership Plus allows a beneficiary to receive OVR services to meet his or her intensive up-front service needs and, after the OVR case is closed, work with an EN to receive job retention services. The goal is to increase employment retention and promote the highest level of self-sufficiency possible.

Fred Orozco of Armstrong Educational Trust offered the following comments:

- Page 39-44 Alignment with Other Partner Programs
The Community Education Councils network (CECs) as designated by PDE will align training development efforts with the overarching strategies of the Commonwealth to increase the education and training delivery to residents of rural communities.
- OR / AND Page 51-53 Leveraging Resources to Increase Educational Access
The Community Education Council network (CECs) as designated by PDE have historically leveraged other state and local funding to implement sector based training provided through a variety of educational institutions in rural communities where campus locations are non-

existent. CECs serve as an intermediary and broker of training programs based on identified need and demand.

- OR/AND Page 53 under the heading Improving Access to Postsecondary Credentials
The Community Education Council network (CECs) as designated by PDE will extend program development activities with postsecondary institutions to ensure that residents of rural communities have access to credential bearing training opportunities.

Response: We agree that the Community Education Councils are important partners and have included them in the final State Plan on pages 40, 51 and 53.

John Powers, Jr. of Ash/Tec, Inc. offered the following comments:

- Training Expenditures: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title I funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well as job seekers that contribute to the regional economy.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- Priority of Service Benchmarks: Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self-service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face-to-face career coaching and mentoring as well as the many other hands-on training

and other programs delivered at PA CareerLink(R) centers that lead to employment success and add value to our communities.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

Linda Helms of B. F. Jones Memorial Library, Aliquippa District Library Center offered the following comment: The WIOA Plan is an ambitious program which will benefit job seekers of all ages, especially youth, across the state of Pennsylvania. The B. F. Jones Memorial Library and other libraries would welcome the opportunity to be a partner in this effort.

Many job seekers and people looking to improve their skills come to libraries every day. The B. F. Jones Memorial Library often sees people who do not have the computer skills to navigate the Career Link website. They may not have an email account, or they may have set up an email account at Career Link, but they have difficulty using it. They may have set up an account at Career Link, but do not have transportation to get back to the Career Link Center. They may not know how to return to their Career Link account, either having lost their login information, or not understanding how to use the Career Link web site.

Libraries can support the work of Career Link by providing personal assistance to these job seekers, as staffing allows. The Library receives requests from job seekers on a routine basis. Its public computers with free internet are used by many job seekers to prepare resumes and apply for jobs. The Library tracks an average of 700 computer check-outs each month. Students and people seeking occupational certifications can use the public computers for online classes and have their exams proctored at the Library.

The Library's e-resources include education databases, such as Universal Class online classes and tutorials and Learning Express, which offers tutorials for high school students and adults. It helps students to prepare for college entrance exams and occupational tests.

Beginning computer classes are also offered for older adults who may not have computer skills or experience. The Library provides one-on-one assistance as staffing permits.

Pennsylvania's libraries can be key partners in providing Adult Basic Education Services, by assisting Career Link users and serving as a satellite location for some WIOA programs. Libraries are dedicated to meeting the education needs of Pennsylvanians and welcome the opportunity to partner with other agencies to this end.

Thank you for considering my comment.

Response: We appreciate the comments about how libraries assist jobseekers with basic computer skills, access to the Internet, and access to educational resources, and made further reference to libraries as system partners on pages 11, 42 and 48 of the final State Plan.

Barber National Institute offered the following comments:

- We would like to commend to authors of the draft WIOA State Plan for their vision and thoroughness in developing this document. Clearly, every effort has been made to provide a path to address the workforce needs of the Commonwealth well into the future. It appears that

all of the potential stakeholders, from government at all levels, not for profits and the business community, will be communicating and coordinating efforts to make this plan a reality for the citizens of the Commonwealth.

The following are a number of examples of activities that would appear to offer individuals with a disability greater opportunity to obtain, maintain and succeed in the workplace and should remain in the final plan:

- The development of Career Pathways with identification of high priority occupations along with jobs that pay family sustaining wages and the development of quality entry level jobs.
- The establishment of Employment First when developing individual plans for service for persons with an intellectual disability.
- The development of micro credentials and apprenticeship programs for persons with a disability.
- The establishment of the DREAM Partnership which will provide College Based Certificate programs for young adults with an intellectual disability.
- OVR collaboration with employers to develop work based learning experiences for persons with an intellectual disability.
- OVR's continued evaluation of the Early Reach program which seeks to assist youth with disabilities in transition planning while still in school.
- Update of the IDEA Memorandum of Understanding and Transition Policy for Pennsylvania.
- Development of an Individualized Plan for Employment (IPE) before students with disabilities graduate or exit high school.
- The continuation of Letters of Understanding (LOU) with not for profit entities that provide services for persons with disabilities.
- Additional OVR Counselor recruitment and a plan for a comprehensive system of staff development and training.
- The development of a Statewide Assessment to focus on the rehabilitation needs of persons with the most significant disabilities including their need for supported employment services.
- The establishment of State Goals and Priorities which are to provide an increase in employment opportunities for individuals with disabilities and to increase/improve Transition Services for students with disabilities.

Response: We appreciate the comments in support of the plan.

- The following items are areas we would like to assure are emphasized to a further degree:
 - Increased interagency collaboration, specifically ID providers who have extensive programming currently in place which could offer transition services for youth.
 - While innovative new programs are needed, successful legacy programs should be explored which would result in an increased number of resources available to support the overarching goal of community employment for both youth and the older population. Programs exist which are very successful at supporting the development of hard and soft skills and maintaining acquired skills while providing minimum wage pay

and outcomes of community integrated employment. Agencies also have programs for adults which teach independent living skills and supports beyond employment.

- OVR is not currently accessing established providers of Intellectual Disability services who have information on individuals that have been referred to OVR for eligibility determination. A process and increased collaboration is desperately needed to ensure enough information is available to the VR counselor to make determinations on eligibility.
- The plan addresses the need and recruitment efforts for VR counselors. A maximum caseload should be established, well below the current number so that counselors have adequate time to support individuals and participate in the employment process with the team.
- The commonwealth is focusing on training for human resources within the business outreach plan. It would be beneficial to expand this training to business persons directly responsible for hiring. Often there is a gap between corporate policy and district/ local management. Training needs to include specifics related to liability and the positive, current workforce statistics for those with intellectual disability. In addition to encouraging employers to participate in business-education partnerships, it would be beneficial to encourage business-provider partnerships.
- It would benefit the Intellectual Disability population and overarching goal of employment if the commonwealth would establish greater opportunities for post-secondary career and technical education beyond ABE specific to individuals with Intellectual Disabilities and/or most significantly disabled. Consideration for Supported Education to achieve degree or certifications is needed.
- The time between referral to OVR and eligibility acceptance or denial should be thirty (30) days.
- Specific documentation of the end of the last phase of OVR contract should be created and shared with the team within enough time to allow the support coordination unit to secure waiver funding for an individual that continues to need some job coaching supports after the OVR phase has been completed. Gaps in funding for providers of supported employment services currently occur due to lack of coordination between OVR, ODP, County's SCO, and providers.

Response: We appreciate the comments. OVR will continue to explore, develop and implement innovative strategies and best practices that assist individuals with disabilities, including individuals with Intellectual Disabilities and/or the most significantly disabled, to achieve competitive integrated employment. DHS would support efforts to ensure that individuals with intellectual disabilities who become successfully employed while being served by OVR get access to Medicaid waiver supports so that there are no gaps in supports that would lead to the individual failing on the job due to a lack of appropriate supports. OVR is in the process of revising its Supported Employment policy to eliminate gaps in funding the necessary supports to help an eligible individual with a disability maintain employment. The draft policy will be released for public comment before it is finalized. The 60-day timeframe from application to eligibility has been established by the Rehabilitation Services Administration, OVR's federal partner.

James Palmer from **Beaver County Corporation for Economic Development** offered the following comments:

- **Training Expenditures:** A broader perspective of the workforce system beyond training is essential. Diverting a fixed percentage of already limited WIOA Title I funds to training could negatively impact the delivery of other valuable career and business services that case workers and career coaches (who support the placement of individuals in training) provide and result in reductions in services at PA CareerLink® centers. Establishing benchmarks based on a percentage of a local workforce area's federal allocations does not allow for the flexibility necessary for workforce development boards to provide the range services that may be necessary for businesses and job seekers in the regional economy.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- **Priority of Service Benchmarks:** Federal law clearly prioritizes services to those with barriers to employment. The establishment of a threshold of 70% of individuals served again limits local workforce development boards. Boards should have the flexibility to address local needs while giving priority to those with barriers.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- **PA CareerLink® – Online Services as an Enhancement:** PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers. Increasing online, self-service options both inside and outside of PA CareerLink® centers has value to those with computer skills and computer and internet access. However, some of the hardest to serve customers do not have those skills or that access. Further, some areas of the state do not have broadband available. Online services cannot replace face-to-face career coaching and mentoring, as well as the many other hands-on training and other programs, delivered at PA CareerLink® centers.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

Joanna Greco from **Beaver County Rehabilitation Center** offered the following comment: I am writing concerning the “Employment First” initiative. My name is Joanna Greco. I am the Contract Acquisition Coordinator for the Beaver County Rehabilitation Center just outside of Pittsburgh Pennsylvania. BCRC’s mission is to help people with disabilities work, always focusing on “teaching work with work”. It is my responsibility to acquire jobs for those we serve. I know firsthand how important it is for someone with a disability feel a sense of pride and inclusion when they do a job well done, whether it is in a workshop environment or a job out in the community.

The “Employment First” initiative is commendable in supporting competitive employment as a choice for individuals with disabilities. BCRC has promoted and placed individuals in competitive community employment for over 50 years. However, we need to protect and expand job opportunities for those with significant disabilities, including employment in sheltered workshops instead of focusing on

eliminating them. I believe that any recommendations on the elimination or phase out of sheltered workshops and Fair Labor Standards Act (FLSA) 14(c) Certificate Programs are flawed because of the lack of data of what happens to individuals with disabilities in communities where these programs have been shut down, and there has been limited study of how many individuals are transitioned out of employment and into day habilitation programs as a result of ending the programs.

Those that participate in our work force has many concerns if they are forced into competitive employment, such as, the fear of losing medical benefits, loss of SSI checks, inability to work a 40 hour week or even part time, transportation issues to and from work or shift work that does not coincide with public transportation. And the fear of the world of work: failure, being unaccepted, taken advantage of, pressure of the job itself.

Another aspect to the "Employment First" initiative ignores the fact that businesses have to compete. They generally can't afford to employ people that are lower producing, and have health or behavior issues. With the rising minimum wage rates, this only makes the competition for jobs even more difficult. I know there are some great community placement agencies that are finding, placing, and retaining jobs for disabled workers. The funding has to follow the people if this is what a state determines as the desired outcome. I would rather see a balanced approach where there are services of all types. The wishes of the people receiving the programs should be the deciding determination. We need to understand there are a wide range of services needed to serve a wide range of disabilities. We all need to respect and support their choices.

Don't deny those with a disability the same opportunity of choice you and I have had the right to exercise in our employment. This is not a one-size-fits-all solution.

Response: We appreciate the comment. OVR continues to identify and develop innovative strategies and supports for individuals with disabilities while we await the release of final regulations, guidance, and technical assistance on Section 511 Limitations on Use of Subminimum Wage. The provisions in section 511 are effective 2 years after WIOA enactment, specifically, July 22, 2016. Section 511 demonstrates the intent that individuals with disabilities, especially youth with disabilities, must be afforded a full opportunity to prepare for, obtain, maintain, advance in, or reenter competitive integrated employment. The WIOA State Plan does not include any provision to "eliminate" the FLSA 14c certificate program. Rather, new requirements in WIOA and from the federal Centers for Medicare and Medicaid Services are requiring states to offer more resources to people with significant disabilities to become employed in a competitive integrated job. CMS rules in particular are implementing funding rules that, after March 2017, will no longer allow federal waiver funds to service individuals in settings that segregate and isolate.

David Dudo of **Beemac Trucking** offered the following comments:

- **Training Expenditures:** While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the

commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- **Priority of Service Benchmarks:** Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- **PA CareerLink® – Online Services as an Enhancement:** PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self-service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face-to-face career coaching and mentoring as well as the many other hands-on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

Susan Lopez from **Boyertown Community Library** offered the following comment: After reading through the first section of the Workforce Innovation and Opportunity Act, I recognized immediately that public libraries could play a major role in helping the goals of this proposal become a reality. Public libraries are a place where many adults already come to search for jobs and to prepare resumes. Libraries, provided they have the staff, meeting space and technology, could be a place where classes for adults and older youth could be held. Classes for the following skills could be included: basic literacy, computer skills, financial management, application, resume writing and interview skills, and networking. This truly is a tremendous opportunity for libraries to show their value!

Response: We appreciate the comments about how libraries assist jobseekers with basic computer skills, access to the Internet, and access to educational resources and made further reference to libraries as system partners on pages 11, 42 and 48 of the final State Plan.

Jennifer Johnson from **Brandywine Heights High School** offered the following comment: High School students are the future of our workforce and who better to help them attain skills that employers look for are libraries & librarians. In high school we instruct & guide student how to find & process/ analyze (good) information, how to use that information by planning, organizing & prioritizing it, and time management skills. All of these skills are highly sought after by both employers & colleges. This is why high school libraries should be included & funded in this plan. There is no other place that every young adult has access to.

Response: PDE appreciates the support of the comment for high school libraries and librarians. However, it is noted that current Pennsylvania law does not require school districts to provide library services; this choice is left to determination at the local level. PDE also notes that WIOA does not provide funds for education services for the general student population. WIOA focuses specifically on youth with barriers to employment.

Bucks County Community College offered the following comment: This plan does not appear to be in the best interest of post-secondary institutions like Bucks County Community College. At first glance, it appears that our essential Perkins funding could possibly be decreased as a result of changes proposed in this plan and that expectations for Perkins' goals should perhaps be more clearly defined.

Response: At this time, the US Department of Education has not provided guidance and the Pennsylvania Department of Education is not able to provide guidance on expectations. WIOA regulation is clear that federal Perkins regulations must be met and the required uses of funds must be met. To the extent that Perkins is a program partner in the Combined Plan, there will be additional reporting requirements and assurances that Perkins recipients must meet.

Bucks County Workforce Development Board offered the following comments:

- On behalf of the Bucks County Workforce Development Board, the following considerations are submitted as comments on the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan Draft for Public Comment, dated December 28, 2015. The Bucks County Workforce Development Board discussed the Draft State Plan at its January Board of Director meeting.

Generally speaking, the Board notes that the Plan appears job-seeker-centric as opposed to employer-centric. We believe the success of the public workforce system resides in the development, at a local level, of a system responsive to the needs of our employer community. Additionally, there are concerns relative to the prescriptive nature of the Plan; there appears to be a lack of autonomy at a local level to provide creative and innovative solutions to local economic and workforce challenges.

Comment: We agree with the commenter that the workforce development system can only be successful if it is responsive to the needs of employers. Goal 2 focuses on developing a pipeline of workers to meet industry needs and Goal 4 speaks to engaging employers and being responsive to their needs. While we agree that local flexibility is important, the State Plan must also be prescriptive at times to ensure the Governor's priorities are achieved.

- Section 2.4 notes that incumbent worker training is available through WEDnetPA and Industry Partnership funding opportunities; these funds are through state budget appropriations and are competitive. Not all local areas consistently benefit from these sources. The WIOA legislation clearly notes incumbent worker training may be conducted through WIOA; this option of funding is not addressed in the State's Plan. We believe a successful local economy is created through its skilled incumbent workforce and request that incumbent worker training through formula funding be specifically articulated.

Comment: We appreciate the comment and note that the commonwealth is drafting that will address the use of WIOA funds for incumbent worker training.

- We applaud the development of the Office of Apprenticeship Training and look forward to an increase in pre-apprenticeship and apprenticeship training opportunities with our partner CTEs, Bucks County Technical High School, Middle Bucks Institute of Technology, and Upper Bucks County Technical School, and the Bucks County Community College. We respectfully request that the definition of training be broadened in the State Plan to include training opportunities outside of traditional ITA and OJT opportunities, including paid internships, pre-vocational, entrepreneurial, paid work experience, and short-term training offered by educational institutions not on the Eligible Training Providers List.

Comment: We do not believe the State Plan in any way limits training to only ITAs and OJTs. The commonwealth will be issuing guidance in the near future to include a definition of training, which will include multiple types of training beyond ITAs and OJTs.

- The training benchmarks in Section 2.1 specify the incremental benchmarks for investment of Title I funding, but fails to include alternate sources for training funds that should be included in the overall benchmark. We respectfully suggest the definition of training is articulated as it is in WIOA Section 134. Our general concern related to this section is the prescriptive nature of this requirement and the inability for a local area to invest and steward the public dollars as it makes sense in that local area.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

Butler County Community College offered the following comments:

- OJT and apprenticeship opportunities should be stressed and financially supported by the Commonwealth. This should be coordinated with efforts such as WEDnet, industry partnerships and newly proposed micro credentials offered by the community colleges and other training providers.

Response: The commonwealth will continue to promote and support apprenticeship opportunities through the newly-established Office of Apprenticeship and will provide financial support to both traditional and non-traditional apprenticeship opportunities, including pre-apprenticeship, through grant funds, Industry Partnerships and other discretionary funding.

- A goal of the plan should be a single-point of entry; one that utilizes the Commonwealth's 14 community colleges as much as possible. The state plan defines "career pathways" on page 243. The community colleges are the ideal entry point on a career pathway, as they offer ABE/GED, Keystone Education Yields Success (KEYS), workforce development training, certificates and associate degrees.

Response: The commonwealth disagrees that there should be a single point of entry into the system. There are numerous populations to be served and very different ways of serving them. There is not a "one-size-fits all" solution to serving both the job seeker and employer customers we are required to serve. We do agree that community colleges are an important partner in service delivery and will consider ways to better utilize the community colleges across the commonwealth.

- Community Colleges should be represented on all WIOA boards, and there should be a designated spot on the state board for a community college president representing the PA Commission for Community Colleges.

Response: The Workforce Innovation and Opportunity Act does not require the appointment of community college officials to the state board, although it does allow for it. The members of the Pennsylvania Workforce Development Board (State Board) are appointed by the Governor. While not required, we note that there are currently two community college representatives on the state board, one of which is a community college president. WIOA Section 107(b)(2)(C)(ii), pertaining to local board composition states each local board "shall include a representative of institutions of higher education providing workforce investment activities (including community colleges)." The commonwealth must certify local board composition to ensure all required entities are appointed.

- This is in regard to community college opportunities in rural areas referenced on page 21. Butler County Community College welcomes the new opportunities provided by the Workforce Innovation and Opportunity Act. As such, the college is eager to share experiences which reflect high levels of innovation. One such opportunity appears to be expansion to areas not served by a community college.

On Page 21 of the plan, it is noted that there is a lack of community college opportunities in rural areas. The college wishes to share the efforts that have been made to address this issue. Butler County Community College has been actively and aggressively serving outlying areas of the Commonwealth since 1982. The college has partnered with many local and regional entities to ensure access to post-secondary education in these areas. The college expanded to

Armstrong County in 1982, Lawrence County in 1989, and Mercer County in 1997. Most recently, the college began offering services in Jefferson, Clearfield, Elk and Clarion Counties in 2010. Buildings have recently been built in Lawrence, Mercer, Brockway and Armstrong in order to provide a broader footprint with greater student services. Today approximately 700 students from these outlying areas attend BC3. Again, the college embraces its role as an active partner in workforce and economic development and looks forward to joint opportunities in the future.

Response: The commonwealth agrees that several of the community colleges have moved beyond their sponsoring service areas to provide education and training to unserved areas. The commonwealth has been a partner in many of these endeavors by providing capital funding to the sites and learning centers when possible. That does not negate the fact that there are still many rural counties that do not have comprehensive community college services available to their residents.

Dennis Frampton of **C&J Industries, Inc.** offered the following comments:

- Training Benchmarks (p. 10: State will establish benchmarks for how much WIOA Title 1 funding must be used for training by local areas): While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- Priority of Service Benchmarks (p. 68: State will monitor data reported to determine the percentage of those served who are individuals with priority of service and barriers to employment): Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. This will have a significant impact on the local area's ability to meet the critical needs of dislocated

workers from Joy Mining, General Electric Transportation Services (GETS), and other employers that are experiencing reductions in the workforce.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- Transitional Jobs (p. 70: Local Workforce Development Boards will be required to use between 5-10% of Title 1 funds to provide transitional jobs and ensure that priority of service for transitional jobs is afforded to individuals who qualify): NW PA WDB applied and received funding from the Workforce Innovation Fund (WIF) federal grant program to target the population described in this section of the State plan as priority of service. The requirement to spend Title 1 funds for this group will negatively impact the ability of staff to meet the goals of the federal program. Flexibility in the state plan for the local board to determine how or what funds are used to meet the requirements is advised. Additionally, the need to get approval from the commonwealth to transfer funds from Title 1-B funds from Adult to the Dislocated Worker Program will negatively impact our ability to be responsive to the needs of dislocated workers in the area such as GETS and Joy Mining.

Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs. Regarding transfer of Title I funds, the commonwealth will review requests to transfer funds as quickly as possible to ensure service delivery is not disrupted.

- Employer Services (p. 24-25) (p.67) and throughout the plan: A definition of High Quality Jobs is necessary to determine the focus of employer services. Recognizing that many of the openings are low end and replacement for turnover and not going deeper into the data is a concern. There are many job seekers that do not have the skills for a higher level position and employers that need to fill these positions in order to vet a new employee that may move up a career pathway/ladder. Also this is cause for concern in prioritizing employers for services that they are begging to have.

The plan, in general, does not cover many employer services. The focus is on the funding which follows the job seeker and is targeted (70%) to those with barriers to employment and prioritizes three areas 1) recipients of public assistance 2) other low income individuals and 3) individuals who are basic skills deficient.

Response: We thank you for your thoughtful comment on the use of high- and low-quality terminology and the resulting subjective interpretations. We recognize that some low-wage jobs are or can be part of a career pathway that leads to better jobs, and we will consider the former as a route to high-quality employment. Stakeholder input is valued as we move towards a more universal and common WIOA language. We agree with the commenter that the workforce

development system can only be successful if it is responsive to the needs of employers. Goal 2 focuses on developing a pipeline of workers to meet industry needs and Goal 4 speaks to engaging employers and being responsive to their needs.

- Data Collection (p. 18 comments 5.1 through 5.7) ROI & Market Penetration (p. 32 table): While we recognize the importance to protecting data, as a local partner the WDB will need to utilize the information to make local decisions that are not necessarily interesting to the commonwealth. The state plan does not clarify what access the local board will have to the data. In addition the definition for ROI and Market Penetration are not clear. If employers are not eligible because they do not qualify for services due to high turnover or low wages (p. 29) it will be impossible to meet the imposed requirements. We encourage the commonwealth to share the raw data with the local areas so that improvements in the system can be made.

Response: The commonwealth must ensure the integrity and security of data among all partners and programs. As the volume and diversity of workforce data grows, so too do the opportunities and challenges of sharing information among all involved. We are committed to expanding access within the parameters outlined by statutes, regulations, and policies that govern the release of this data. Additional clarity for the ROI and market penetration measures will be provided once final WIOA regulations are released.

- High Priority Occupations (HPO) List and High Turnover Positions (p. 24-25): It is admirable that the commonwealth wants to reduce the high turnover rates and focus on retention, but without a change in the method for developing the HPO list it will be nearly impossible. Given the principle of consumer choice used at the PA CareerLinks® it is unlikely that we will experience a reduction in the number of individuals requesting training that is on the HPO list to focus on positions where the turnover is low.

Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned.

- Workforce Development System-Alignment Strategy (p. 29) : This is an area that can be improved in the PA CareerLinks® and I am pleased to see that the commonwealth recognizes the need. Each partner in the PA CareerLinks® should be willing to serve each client that enters and share the information with all professionals employed in the site.

Response: We appreciate the comment in support of this effort.

Susan Banks of the **Carnegie Library of Pittsburgh** offered the following comments:

- In general, the plan would benefit from the explicit inclusion of public libraries as intrinsic and important partners in the effort to build the workforce of the future in Pennsylvania. For many

years, public libraries like the Carnegie Library of Pittsburgh in communities large and small have successfully provided programs and services to support economic and workforce development. Public libraries are central to the success of job seekers, businesses seeking skilled workers and residents of our communities who seek support during transitional times in their lives for which there is precious little infrastructure. Public libraries are consistent and dependable partners with their local workforce development boards and have maintained accessible services to populations in need – in many cases since public libraries were established.

Specifically, in each goal area, there are aspects of the planned activities that align completely with public libraries' missions and most of their practices, and as such would benefit from the inclusion of public libraries as named entities. In Goal 1, libraries frequently address and support the development of basic literacy skills for adults and provide the entry point for job seekers with barriers to mainstream career pathways.

Response: We appreciate your comments related to libraries and the role they play in developing the workforce for the future and made further reference to libraries as system partners on pages 11, 42 and 48 of the final State Plan.

- In Goal 2, libraries provide the space and technology to support both the individuals and the organizations listed in several of the strategies. We work closely with our local workforce development boards and many libraries supplement the services of their LWDB.

Response: We appreciate the comments about the technology and space available in libraries to develop a strong workforce.

- As described in Goal 3, library services and outreach specifically to out-of-school youth are growing and thriving in communities of every size. Supporting and guiding this population in transition is an emerging field of study and service in the library field, as well, and it would benefit every player in this plan to take advantage of the insights and existing structures that link to and serve those youth in preparing them for a successful transition to adulthood.

Response: We appreciate the comments about libraries' support of out-of-school youth.

- In Goals 4 and 5, libraries have made robust connections with the business and corporate communities to link the job seekers to those seeking quality workers. Public libraries often serve as aggregators and providers of access to local data that can create a shared platform for understanding the evolving nature of each community as well as rich insight into the needs of specific populations to help in decision-making and service design.

In conclusion, I urge you to explore the roles that public libraries can and should play in supporting and, in some cases, leading the work outlined in this plan. Public libraries already do this work and act as meaningful partners in pursuing many of the objectives listed.

Response: We appreciate your comments about the library's role as an aggregator of data and convener of groups to better understand workforce trends for your community.

The Center for Employment Opportunities offered the following comments:

- On behalf of the Center for Employment Opportunities and the individuals we serve, I thank Governor Wolf and the state agencies collaborating to develop the draft Pennsylvania's WIOA Plan. The draft plan represents a comprehensive and innovative effort to build an effective and more aligned workforce system across the state.

Pennsylvania's WIOA Plan presents the state with a unique opportunity to improve the delivery of workforce development programming and services in a manner that meaningfully addresses the training and employment challenges of our highest need communities. Including the following considerations in the state plan will ultimately maximize education and employment outcomes for the state, boost our economy and support a future of shared prosperity. As an organization working to increase access to opportunity for individuals with convictions, we believe WIOA's prioritization on individuals with barriers to employment offers an excellent opportunity to provide individuals with criminal convictions at highest risk of recidivism the skills and resources necessary to succeed in work while supporting themselves and their families.

Response: We appreciate the comment in support of our efforts.

- Today there are approximately 360,000 people in Pennsylvania who are either incarcerated or on correctional supervision - costing the state over \$2 billion annually. Each year tens of thousands of men and women return home to from jail and prison to Pennsylvania communities. These individuals' criminal convictions carry an additional barrier to employment along with other barriers many Americans face. The unemployment rate for recently released individuals is between 60-70% due to significant barriers in access to jobs upon release. Furthermore, a history of incarceration reduces an individual's hourly earnings by 11% and annual earnings by 40% for their entire work history.

Employment has been shown to make communities safer and to decrease criminal justice recidivism, especially among individuals who are most at risk of returning to incarceration. For example, CEO transitional work and vocational programs have shown statistically significant reductions on all measures of recidivism with an over 20% reduction in reconviction and returns to incarceration with program participants. CEO's program also saves taxpayers up to \$3.30 for every dollar spent, or \$8,336 saved per person. CEO's success is even more pronounced when serving young adults and those at highest risk of recidivism. Organizations such as CEO can serve as key partners with local Workforce Investment Boards to ensure they fulfill WIOA's requirements to serve adults receiving public assistance, other low-income individuals, and individuals who are basic-skills deficient.

Response: We appreciate the comment and encourage organizations like CEO to partner with Local Workforce Development Boards.

- Given our experience working with this population, CEO sees several clear strengths in Pennsylvania’s WOIA plan, including:
 - Inclusion of formerly incarcerated individuals (or “ex-offenders”) among the prioritized population of people with high barriers to employment
 - An emphasis on and dedicated funding for programs serving out-of-school youth and young adults
 - Dedicated funding (20% of youth funds) to provide young adults with high quality work experience
 - Dedicated funding by Local Workforce Development Boards (LWDB) and CareerLink Centers (5-10% of funds) for transitional work opportunities for priority populations.
 - Inclusion of transitional work programming on the list of eligible training opportunities and a prioritization of those training opportunities to serve populations with barriers to employment
 - Specific emphasis on the importance of workforce opportunities to the successful reintegration of formerly incarcerated individuals, including a focus on evidence-based models such as CEO’s transitional work program, motivational interviewing, CBT practices, and employment retention services.

Response: We appreciate the comment in support of numerous aspects of the plan.

- Additionally, CEO believes that with four additions to the plan, the State can more deeply encourage local Workforce Investment Boards to better serve residents with past convictions and enable their long-term success in the workforce. These changes include:
 - Provide specific funding guidance to support formerly incarcerated individuals: While Pennsylvania’s WIOA plan provides excellent guidance in encouraging local WIBs to serve men and women with past convictions, CEO recommends dedicating specific funding to this population. Formerly incarcerated individuals are among the most difficult people to employ, but their success in the workforce has among the best social and economic outcomes for the State — including increased public safety, lower corrections costs, and increased stability in some of the most challenged communities in the state. Without a direct funding requirement dedicated to this population, the State risks formerly incarcerated individuals being left out of the workforce system and funding instead supporting sub-populations with lower barriers.

Response: We appreciate the comment and will take it under advisement.

- Loosen wage expectations for the highest risk populations: CEO has learned through 20+ years of service to populations with the highest barriers to work that access to the

workforce, successful development of workplace habits and norms, and long-term job retention are equally as important to young adults and men and women with the highest barriers to employment as the wages they earn. By loosening wage expectations specifically on these populations, and enabling local WIBs the flexibility to place high-risk populations into the labor market without affecting their overall wage goals, the State can encourage services to this population and ensure that all Pennsylvanians who want to work have a starting point to enter the labor market.

Response: We appreciate the comment and note that WIOA presents many new performance measures and goals. For many populations, there is little or no baseline information. The targets as expressed in the plan represent a starting point for conversations among providers, partners, and policy-makers. We also recognize some subjectiveness in the term "high-quality jobs" in the introductory language under Goal 4. While the State Plan emphasizes and encourages high-quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high-quality jobs.

- Define "Transitional Jobs" to ensure high quality experiences for participants: CEO applauds the State's strong prioritization of transitional work as a key driver of successful employment, but suggests Pennsylvania provide a clear definition of transitional jobs, reflecting the federal WIOA legislation, that ensures fidelity to proven approaches. By definition, transitional jobs are:
 - time-limited work experiences that are subsidized and are in the public, private, or nonprofit sectors for individuals with barriers to employment who are chronically unemployed or have an inconsistent work history;
 - combined with comprehensive employment and supportive services; and
 - designed to assist individuals to establish a work history, demonstrate success in the workplace, and develop the skills that lead to entry into and retention in unsubsidized employment.

In addition, CEO believes the highest quality transitional jobs include a team-based approach and active, consistent supervision.

Response: We appreciate the comment and plan to provide further guidance and definition on training, including transitional jobs, in future policy.

- Provide specific training funds for transitional work: With 30% of overall funds dedicated to training, PA has an opportunity to ensure men and women are receiving employment-based training that builds workplace habits and develops skills. Transitional employment encourages consistent program participation by combining income and training and ensures participants are learning skills demanded by real employers. CEO believes the State can go even further than including transitional work as an eligible training activity, by requiring that

a percentage of training funds be spent on programs that provide real paid work experience in addition to training.

Response: We appreciate the comment and note that the plan requires Local Workforce Development Boards to use between 5 and 10 percent of their funds on transitional jobs.

The **Centers for Independent Living** commented: Under the section Alignment with Other Partner Programs it make mention of the many other partners that provide services and support to persons with disabilities and seniors. In particular, on page 41 it even names the PA Links to Aging and Disability Resources (PA Links) as a resource for elderly Pennsylvanians and adults with disabilities.

Recommendation - It is important to know that the 18 PA Centers for Independent Living (CILs) have been in establishment much longer than PA Links, but are not stated as a partner. CILs have for many years provided services and supports to seniors and adults with diverse disabilities and should be included as one of the stated partners in the Pennsylvania's WIOA Combined State Plan!

Response: We agree that the Centers for Independent Living (CILs) are a valuable partner and have added the CILs to the section on Alignment with Other Partner Programs on page 41-42 of the final State Plan.

Jane Irwin of the **Central Penn Institute of Science and Technology** commented: I am the fiscal agent for a consortium of six Practical Nursing Programs that participate in Perkins Funding. Our small programs benefit greatly from Perkins funds utilizing those funds for enhancement of our programs and services that directly benefit in the education of Practical Nurses. As practical nursing is considered a high priority occupation, funds from the Perkins grant allow our programs to provide a quality education to those who will serve the health need of Pennsylvania's citizens. The WIOA Combined State Plan is not clear as to whether or not funds will be diverted from Perkins grants and added to Career Link budgets. Since it is so unclear and the proposed change would begin in July, 2016, I would request that this proposal be further analyzed in regard to its impact on programs receiving Perkins funds and considered possibly when the plan for Perkins V is available. I would appreciate any feedback regarding this proposal as it is available, as the potential impact to our nursing programs could be very detrimental.

Response: PDE recognizes the importance of the Practical Nursing programs offered across the state and which receive federal Perkins funds. Each recipient has worked to meet the federal mandate to develop a program of study (secondary to postsecondary) and each recipient has provided a seamless program of study to students pursuing a career in allied health. Students across the state have realized a tuition savings of over \$2,000 as a result of this alignment. With a decrease of \$10 million in Perkins state allocations, PDE also realizes that each Perkins recipient has realized a decrease in federal support. Perkins recipients must continue to comply with federal Perkins regulations and use the Perkins funds as mandated. At this time the US Department of Education (USDE) has not provided guidance on the requirements of Perkins recipients regarding a Combined WIOA state plan. The Pennsylvania Department of Education is not able to provide further guidance on expectations beyond the draft plan

but will continue to work with the Perkins recipients as further information is released from USDE. WIOA does require each Perkins recipient to enter into agreement with the LWDB to provide services such as career counseling or career information. This can be in-kind or funds.

The **Central Pennsylvania Workforce Development Corporation** made the following comments:

- Thank you for the opportunity to comment on the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan for the period July 1, 2016 through June 30, 2020. As a Local Workforce Development Board representing the largest geographical workforce development area in Pennsylvania, we offer comments to aid the Commonwealth in meeting the goals and objectives outlined in the plan based on the experience and knowledge of local workforce development, economic development, and education professionals, private sector volunteers, and local elected officials within Central Pennsylvania. The Central Pennsylvania Workforce Development Corporation (CPWDC) offers recommendations or seeks clarification on the plan as outlined below.

Response: We appreciate the feedback.

- Training Benchmarks (PA WIOA Plan 2.1, p. 10): CPWDC has taken multiple steps to encourage individuals to enter formal training including increasing the amount an individual or business can receive for an individual training account (ITA) (increased from \$6,000 to \$9,000) and on-the-job training reimbursement (removed \$6,000 cap) which doubled the number of customers entering training from program year (PY) 2013 to PY 2014 and 2015; however, budgeted training funds still remained unspent at the end of the year. During PY 2014 and PY 2015, CPWDC's total training budget in comparison to the WIA/WIOA Title I allocations were 36% and 21%, respectively. CPWDC's experience has shown us that making it easier for jobseekers to enter training and increasing the amount paid per jobseeker will increase the number of individuals enrolling in training; however many customers have other barriers that need addressed before they can enter training and be successful, or they need to find employment as soon possible and can't wait for formal training regardless of the amount of training money available to them.

As a result of the 50% minimum training expenditure requirement for Title I, local boards could train the same number or less people than we already serve to the detriment of individuals and businesses receiving other services at the PA CareerLink®, high schools, and other locations that are not currently categorized as training. The minimum training expenditure threshold for the Central Workforce Development Board based on the PY 2015 budgets would reduce Title I funding for PA CareerLink® operations including staff and infrastructure, business services, our year-round in-school youth career coaching program, and workforce development board operations by \$1.5 million annually.

CPWDC makes the following recommendations and seeks clarification in regards to the minimum training thresholds.

- As written, the minimum training thresholds apply to all Title I programs (i.e. Adult, Dislocated Worker, and Youth); however, eligibility for dislocated workers is not based upon barriers. Also, youth must have a legislative barrier to enroll in WIOA programs and WIOA includes a 20% training requirement for youth. As such, we request that Title I Dislocated Worker and Youth programs be excluded from the training requirements.
- Exclude the 10% administrative portion of Title I contracts when calculating the minimum training expenditures mirroring the WIOA formula to determine the 75% out-of-school youth minimum expenditure requirement.
- Include all allowable training activities under WIOA section 134 as well as paid work experience, internships, training offered by Title I staff, the cost of assessment and case management necessary for participants to enroll in and successfully complete training.
- Include support services and needs related payments necessary to complete training towards the training expenditure requirement.
- Include training conducted under all other local, state, and federal funding including but not limited to Rapid Response, National Dislocated Worker, H-1B, Jobs Accelerator, and other grant programs to offset the training target.
- Include PELL, scholarships and other forms of financial aid to offset the Title I training target. Low-income individuals are often eligible for PELL grants reducing or eliminating the need for WIOA funds based on training costs.
- Include one-stop partner program training expenditures for participants dual enrolled in the one-stop partner program and WIOA including Adult Basic Education, Trade Act, etc.
- It is recommended that the state consider incorporating a waiver process for local boards that can justify a rationale for setting a lower goal than described in the state plan for training expenditures.

Response: We appreciate the comments and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets. We have also clarified that administrative funds do not apply when establishing training benchmarks. A policy will be issued in the near future that will define “training” for purposes of the targets. The policy will provide a process for local areas to request that additional training types and models count toward meeting the targets.

- CPWDC recommends that with respect to the goal of expending 50/60/70% of Title I training expenditures on individuals with barriers, additional clarification to this section be considered as described below.

- Exclude dislocated workers from the calculation as their eligibility is not based upon barriers.
- Include the barriers identified in the local boards' priority of service policies, including but not limited to not earning a "self-sufficient" wage towards the training targets.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas in meeting the targets. A policy will be issued in the near future to further clarify the training benchmark requirements.

- Priority of Service (PA WIOA Plan p. 67): CPWDC agrees that priority of service (POS) should be given to individuals with barriers. By implementing a high priority of service requirement of 70% of participants served, this could leave a large portion of low-income individuals underserved by the public system. In PY 2014, CPWDC served 2,589 WIOA participants, of which approximately 15% met the priority of service definition. CPWDC would have needed to turn away over 1,400 WIOA participants to meet the 70% threshold. Many of these participants, while not POS are part of the working poor that came to the PA CareerLink® to improve their skills and find better employment.

There are also concerns that publicly posting priority of service information may not be in the best of interest of the jobseeker customer or the PA CareerLink® as it serves businesses based on the stigmas associated with meeting priority of service. Businesses want to know we will work with the best candidates available to meet their needs, regardless of the jobseeker's status when enrolling in WIOA programs.

Similar to the recommendations with regard to the training expenditure thresholds, it is respectfully submitted that the state considers the following clarifications with respect to "priority of service":

- Exclude dislocated workers as their eligibility is not based upon barriers.
- Include the barriers identified in the local boards' priority of service policies, including but not limited to not earning a "self-sufficient" wage and being part of population with a historically high unemployment rate, such as youth and returning citizens, towards meeting the priority of service goals. Also include all WIOA youth as meeting priority of service based on the legislative barriers required to enroll in the program.
- Exclude the requirement to inform individuals and publicly post priority of service information, other than for veterans and their spouses. By informing individuals of their priority, we have concerns this will lead to complaints where an individual is not provided services due to other reasons. Also, publicly posting this information could imply to both businesses and jobseekers that WIOA is an entitlement program, which it is not.

- It is recommended that the state consider incorporating a waiver process for local boards that can justify a rationale for setting a lower goal than described in the state plan for services / training for individuals with barriers.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis. Regarding informing individuals of priority of service, the portion of the plan referenced merely suggests posters as one means to inform customers about priority of service. Local areas will have flexibility in how they outreach and provide information to priority populations.

- Transitional Jobs (PA WIOA Plan p. 70): While transition jobs are appropriate and necessary for individuals with poor or non-existent work history, CPWDC respectfully requests this be restated as a goal rather than a requirement for transitional jobs. It is our belief that on-the-job training contracts, which result in unsubsidized employment should take preference over funding transitional jobs that are time-limited work experiences that do not result in continued, unsubsidized employment. Also, WIOA only prescribes a work experience expenditure requirement for youth.

Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs.

- Industry Partnerships (PA WIOA Plan 4.4 p. 16): CPWDC fully recognizes the value of Industry Partnerships and sharing information between businesses within the same industry. At its peak, CPWDC provided financial support to seven Industry Partnerships with Industry Partnership funding appropriated in the state budget. As state funding for Industry Partnerships has declined, CPWDC has not received Industry Partnership funding during the past two years and received reduced funding in prior years.

CPWDC makes the following recommendations in regards to Industry Partnerships due to the uncertainty of funding.

- Allocate Industry Partnership funding from the state budget to all local workforce development boards (LWDB) instead of competitively awarding grants to only selected LWDBs.
- Accept in-kind services, such as personnel cost to organize meetings and trainings, donated meeting space, etc., towards meeting this requirement.
- Encourage and incentivize, rather than mandate, LWDBs to provide financial support to Industry Partnerships.

Response: Industry Partnership funds will continue to be allocated through a competitive grant process. The commonwealth believes that Industry Partnerships must be a state/local partnership. In-kind services will be permitted to count, to some extent, toward the requirement for local support of Industry Partnerships. Industry Partnerships and similar sectoral partnerships are central to the Governor's vision of an industry-engaged workforce development system. For this reason, it is critical that LWDBs as well as the state and industry partners contribute to their support.

- State Policies and Guidance (WIOA Plan p. 74): The following are comments specifically in regards to the Workforce System Policies attached to the WIOA plan (p. 74). Since the implementation of the Workforce Investment Act (WIA) in 1998, the Commonwealth has used a consortium model to act as the One-Stop Operator in accordance with WIA. WIA specifically excluded workforce boards from being one-stop (PA CareerLink®) operators. Section 107(g)(2) of WIOA states that a Local Board may be designated or certified as a one-stop operator only with the agreement of the Chief Elected Official in the local area and the Governor. CPWDC respectfully requests the restriction that a local workforce development board and its staff cannot be designated as a PA CareerLink® Operator be removed from the policy for the following reasons.

Several of the functions of the local board, in partnership with the chief elected official, are to provide program oversight of the one-stop delivery system and ensure the appropriate use, management, and investment of funds. The proposed minimum role of a one-stop operator in WIOA is to perform coordination across one-stop partners and service providers. Pennsylvania's plan furthers establishes that the operator will consider how well all of the one-stop partner programs coordinate and integrate service delivery, promote the seamless transition of customers from one partner to another and demonstrate the capacity to meet the needs of customers accessing the PA CareerLink® system (p. 58).

Membership of the local board includes representatives of private business, economic development and mandated partners in the PA CareerLink® including Title II Adult Basic Education, Title IV Vocational Rehabilitation, Wagner-Peyser, Veterans, Trade Act, and Unemployment Compensation. Because of the previously mentioned functions and responsibilities of the board, the LWDB has an inherent interest in ensuring the PA CareerLink® partners work together and create a cohesive workforce system that excels. The diversity of the local board membership representing multiple PA CareerLink® partners also provides a check and balance so that no WIOA program would receive preferential treatment if the LWDB is the operator.

Another firewall and checks and balance in WIOA is the requirement that both the Governor and the chief elected official must agree for a local workforce development board to be an operator. The Governor has the option to disallow the LWDB from being an operator where firewalls of the operator, board, and service provided could be blurred, which may exist in

cases where career services and training services are provided by an inter-related agency (i.e. county agency or commission structure) that is also the employer of local workforce development board staff and/or fiscal agent staff. For LWDB that do not provide career and training services, there are no potential conflicts of interests that could arise from the LWDB being an operator; therefore the Governor could allow for LWDB that do not provide career services to be an operator on a case-by-case basis.

Along with the interest of the LWDB for wanting the PA CareerLink® to excel in meeting performance, there are also financial reasons the LWDB should not be precluded from being the PA CareerLink® Operator. Under WIA, additional funding from local boards was not set aside for a PA CareerLink® Operator because the members of the One-Stop Operator Consortium provided oversight at no additional cost to the programs they represented on the One-Stop Operator Consortium. Also, workforce boards monitored the PA CareerLink®/one-stop system as part of the PA CareerLink® certification process for no additional costs to the workforce board. WIOA now requires local boards to procure a PA CareerLink® Operator. Unless a new organization or the existing Operator Consortium submits a zero-cost proposal to be the PA CareerLink® operator, local workforce development boards and other state partners will now have to pay for something that had no associated cost in the past. This additional cost could be mitigated if local boards and their staff can be the operator.

Response: The governor is not prepared to allow local workforce development boards or staff to the local boards to serve as single-entity operator or as part of a consortium that will make up an operator. Pennsylvania had been well served by WIA's prohibition on local Boards serving as operators. The commonwealth is currently considering all aspects of the operator selection process and will issue guidance at a later date.

Carol Barbarich of the **Central Susquehanna LPN Career Center** commented: I am a member of a consortium of six Practical Nursing Programs that participate in Perkins Funding. Our small programs benefit greatly from Perkins funds utilizing those funds for enhancement of our programs and services that directly benefit in the education of Practical Nurses. As practical nursing is considered a high priority occupation, funds from the Perkins grant allow our programs to provide a quality education to those who will serve the health need of Pennsylvania's citizens. The WIOA Combined State Plan is not clear as to whether or not funds will be diverted from Perkins grants and added to Career Link budgets. Since it is so unclear and the proposed change would begin in July, 2016, I would request that this proposal be further analyzed in regard to its impact on programs receiving Perkins funds and considered possibly when the plan for Perkins V is available. I would appreciate any feedback regarding this proposal as it is available, as the potential impact to our nursing programs could be very detrimental.

Response: PDE recognizes the importance of the Practical Nursing programs offered across the state and which receive federal Perkins funds. Each recipient has worked to meet the federal mandate to develop a program of study (secondary to postsecondary) and each recipient has provided a seamless

program of study to students pursuing a career in allied health. Students across the state have realized a tuition savings of over \$2,000 as a result of this alignment. With a decrease of \$10 million in Perkins state allocations, PDE also realizes that each Perkins recipient has realized a decrease in federal support. Perkins recipients must continue to comply with federal Perkins regulations and use the Perkins funds as mandated. At this time the US Department of Education (USDE) has not provided guidance on the requirements of Perkins recipients regarding a Combined WIOA state plan. The Pennsylvania Department of Education is not able to provide further guidance on expectations beyond the draft plan but will continue to work with the Perkins recipients as further information is released from USDE. WIOA does require each Perkins recipient to enter into agreement with the LWDB to provide services such as career counseling or career information. This can be in-kind or funds.

The Chief Elected Officials and local Workforce Development Board Chairs from **Central, North Central and Southern Alleghenies Workforce Development Boards** offered the following comments:

- We write to you representing twenty-one rural counties covering over a third of Pennsylvania's land mass. While we applaud the collaborative approach that is occurring at the state level amongst partners we wish there was more time for dialogue with the local system. We represent the rural local system and are poised to continue to serve our customers, the residents and employers of Pennsylvania, as we have successfully done in the past by adapting our services as our local customers' needs change. We recognize that Pennsylvania is a very diverse state that includes urban population centers and very large rural areas. That is why it is difficult to take a 'one-size fits all' approach that doesn't take in to account local demographics, local challenges (both from a geographic and human resource perspective) and local economic conditions.

Specifically in regard to the draft Pennsylvania Workforce Development Plan that we reviewed, we have one major concern and offer an alternative approach. Our biggest concern is in regard to the stated expenditure requirements for WIOA Title I: 30% in 2016, 40% in 2017, and 50% in 2018 with expectations to serve those with barriers at an increasing rate as well. While the state plan is being developed as a unified state plan and takes a much more comprehensive view of workforce development we struggle with why this mandate would fall on one partner. Instead please consider setting broader benchmarks that actually encourage cross-program/cross-department integration and leveraged funding. This will ensure that individual program metrics and performance measures are not lost but rather recognized and aligned. For example, participants can be co-enrolled in Title I, Title II, Title IV, or EARN programs to name a few partners, all of which financially support adult, dislocated worker and youth participants in training and increasing employability skills; however the proposed minimum expenditure requirement for Title I puts the financial burden on Title I partners and doesn't account for the leveraged training resources of the Adult Education, Vocational Rehabilitation and EARN providers. In addition to a more inclusive goal we recommend that the focus be based on numbers of customers, both business and jobseeker, receiving value-added services resulting in increased skills attainment, job placement, and retention rather than expenditures. A goal to increase the

number of credentials in Pennsylvania in the next three years by 30% is something everyone can get behind and support but urge local flexibility based on local needs.

An expenditure requirement will result in unintended consequences, especially in rural areas. A minimum expenditure requirement from 30-50% of all WIOA Title I (Adult, Dislocated Worker, and Youth) funds will result in the closing of multiple PA CareerLink® offices increasing the distance and travel time for customers and a reduction in services available at the PA CareerLink®. In our 21 county region, access to public transportation is sparse and reducing the number of PA CareerLink® facilities will put an increased burden on individuals with barriers to employment who cannot afford the gas to travel 40 plus miles for services. While staffing is the largest portion of the Title I expenditures in our region, the majority of those expenses pay for Workforce Specialists and PA CareerLink® Workshop Instructors who serve as mentors and provide career services including development of learning skills, critical thinking skills, digital literacy skills, communication skills, interviewing skills, punctuality, personal maintenance, professional conduct, and self-management skills to prepare individuals for unsubsidized employment and training. A minimum expenditure requirement will force local areas to lay-off these staff, unless their services are counted as training in the state plan, which will result in less individuals having access to services and receiving these critical skills and the mentoring that occurs not only while jobseekers are enrolled in our programs, but also during the year of follow-up after individuals enter unsubsidized employment or training. The emphasis on a minimum training expenditure for Title I could ultimately result in a few people in expensive training or a lot of people in cheap training. We like much of what has been identified in the state plan including greater support for industry partnerships, career pathways, and micro-credentials. However, we struggle with how this all will be implemented in light of the proposed resource allocation requirements for Title I.

Response: The State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved. The process of implementing the WIOA state plan will provide opportunity for dialogue between the state, the LWDBs and the various local actors who make up the workforce system at the local level. Regarding training targets, we appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- Another concern we would like to address is the increased reference to and reliance on technology for delivering services. While we agree that this is increasingly the “way of the world” it is not the reality in rural areas like ours. While roughly 90% of Pennsylvanians have access to high speed, wired broadband internet, our regions fall far short of the level of connectivity needed to fully utilize technology in service delivery as indicated in the broadband coverage map. Furthermore, many of our customers, especially those with significant barriers to employment, lack even the most basic computer skills and are therefore unable to enroll on Job Gateway. Many come into our PA CareerLink centers to first participate in the Intro to Computer classes and then, because they have no other access to technology due to the cost, use our PA CareerLink® computers to access Job

Gateway. We have all experimented with virtual services, but given the many issues surrounding the availability and use of technology, the results have been mixed.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

Michael DiBerardinis, Managing Director for the **City of Philadelphia** commented: On behalf of the City of Philadelphia, I am writing to support the portion of the Commonwealth's proposed WIOA Combined State Plan that provides: LWDBs and PA CareerLink® centers will be required to use between 5 and 10 percent of their funds to provide transitional jobs, as permitted under Section 134(d)(5) of WIOA, and to ensure that priority of service for transitional jobs is afforded to individuals who qualify for priority of service. The City of Philadelphia strongly supports designation of WIOA funds for transitional jobs as part of the state's workforce development strategy. While unemployment rates have abated throughout the Commonwealth and the City, too many Pennsylvanians face stubborn barriers to employment and continue to find obtaining unsubsidized jobs impossible. People with criminal records, youth, and the long-term unemployed are among those for whom jobs have proven elusive, even as economic conditions have improved.

Over the last 20 years alone, Philadelphia has witnessed the power of transitional jobs in establishing pathways to employment, while at the same time providing desperately needed income. The Transitional Work Corporation helped thousands of parents through jobs at the onset of welfare reform. More recently, Way to Work Philadelphia provided more than 13,000 adults and young people with jobs in the depths of the Great Recession, operating based on stimulus funds from May through September 2010. Currently, pilot programs have placed returning citizens in transitional jobs in Philadelphia's Department of Parks and Recreation. These programs illustrated how a well-designed program can serve community priorities while also providing individuals with jobs. The City of Philadelphia struggles with the highest rate of deep poverty among the top ten cities in this country. The inability of so many of our residents to find work, because of employment barriers and insufficiency of supply, is one of the major reasons for this entrenched poverty. Transitional jobs are a powerful tool that we hope to have among our anti-poverty strategies. We commend the Commonwealth for recognizing the importance of transitional jobs and stress the necessity for this provision to remain in the plan. We look forward to working with the Commonwealth to blend WIOA and other income streams into a vibrant transitional jobs program.

Response: We appreciate the comment in support of requiring a portion of funds to be used for transitional jobs.

Cheryl Krieg from the **Clearfield County Career and Technology Center** commented: I am a Practical Nursing Program Director who is part of a six school consortium that participates in Perkins Funding. Our programs utilize those funds for enhancement of our programs and services that directly benefit in the education of Practical Nurses. As practical nursing is considered a high priority occupation, funds from

the Perkins grant allow our programs to provide a quality education to those who will serve the health needs of Pennsylvania's citizens. It is my understanding that the WIOA Combined State Plan is not clear as to whether or not funds will be diverted from Perkins grants and added to Career Link budgets. Since it is so unclear and the proposed change would begin in July, 2016, I would request that this proposal be further analyzed in regard to its impact on programs receiving Perkins funds and considered possibly when the plan for Perkins V is available. I would appreciate your taking this concern into consideration. Please share any information regarding this proposal as it becomes available, as the potential impact to our nursing programs could be quite detrimental.

Response: PDE recognizes the importance of the Practical Nursing programs offered across the state and which receive federal Perkins funds. Each recipient has worked to meet the federal mandate to develop a program of study (secondary to postsecondary) and each recipient has provided a seamless program of study to students pursuing a career in allied health. Students across the state have realized a tuition savings of over \$2,000 as a result of this alignment. With a decrease of \$10 million in Perkins state allocations, PDE also realizes that each Perkins recipient has realized a decrease in federal support. Perkins recipients must continue to comply with federal Perkins regulations and use the Perkins funds as mandated. At this time the US Department of Education (USDE) has not provided guidance on the requirements of Perkins recipients regarding a Combined WIOA state plan. The Pennsylvania Department of Education is not able to provide further guidance on expectations beyond the draft plan but will continue to work with the Perkins recipients as further information is released from USDE. WIOA does require each Perkins recipient to enter into agreement with the LWDB to provide services such as career counseling or career information. This can be in-kind or funds.

The **Coalition for Low Income Pennsylvanians** offered the following comments:

The Coalition for Low-Income Pennsylvanians strongly supports Pennsylvania's Proposed State Plan implementing the federal Workforce Innovation and Opportunity Act. The Coalition for Low Income Pennsylvanians (CLIP) is a group of 34 diverse organizations from across Pennsylvania including the faith community, service providers, legal service advocates, anti-poverty and anti-hunger groups, children's advocacy organizations and community action agencies. CLIP's primary mission is to protect individuals and families who struggle against the ravages of poverty by advocating for responsible, compassionate, and cost-effective government policies. As advocates for low-income persons, including especially those who receive public assistance, our interest in the WIOA State plan is focused primarily on: (i) priority of service for recipients of public assistance and other low-income persons; (ii) Career Pathways programs; and (iii) transitional jobs. More detailed comments supportive of the Proposed Plans provisions in these areas have been submitted by Community Legal Services and the Community Justice Project. CLIP endorses those comments.

We support the Proposed WIOA State Plan because it offers real promise of education, training, and paid work experience for parents whose families receive public assistance and who wish to raise their families' standard of living through employment in jobs that are in demand and pay a family sustaining wage. Pennsylvania's proposed WIOA state plan would provide these families the avenues and opportunities they need to obtain these kinds of jobs.

Priority of service for families receiving public assistance was a requirement in the Workforce Investment Act (WIA) and the Job Training Partnership Act (JTPA) before that. For the most part, however, states did not live up to their obligations under this provision. National data show that only 48.7 percent of adult “exiters” who received training and/or intensive services through the WIA Adult funding stream were “low-income individuals” in Program Year 2013 – a marked decrease from 71.3 percent in Program Year 2001. And only 3.8 percent of those served in Program year 2013 were TANF recipients.

To address past failures, WIOA strengthens WIA’s priority of service requirements. It also adds a promising new adult education opportunity for low-income parents in need of GED, ESL, or literacy instruction through its emphasis on Career Pathways programs, which offer adult education infused with career counseling and assistance with transition to postsecondary jobs skills training. Moreover, WIOA permits up to 10% of training funds to be used for transitional jobs (subsidized employment) for low-income parents who lack work experience or face other barriers to employment.

The following are the specific provisions in the Proposed Plan that we support:

Priority of Service: We think the plan, as proposed, does a good job of addressing the training needs of low-income parents through strong and mandatory provisions implementing WIOA’s priority of service provisions for recipients of public assistance and other low-income persons, as well as by setting benchmarks for providing training services to these high needs priority groups. (See, Proposed WIOA State Plan, pp. 10-12, 2.1 and 2.11)

The proposed plan also includes specific guidance to Local Workforce Development Boards (LWDBs) and CareerLinks on what “priority of service” means and how it works, which we think is absolutely essential to successful implementation of priority of service for the high needs groups targeted by WIOA. (See, Proposed WIOA State Plan, pp. 67-70)

Career Pathways: The proposed WIOA state plan would require that Local Workforce Development Boards (LWDBs) and CareerLinks develop and operate Career Pathways programs, as defined in WIOA, and that such programs provide for entry at the literacy, ESL, or GED level . We strongly support these provisions.

Transitional Jobs: The proposed WIOA state plan includes a requirement that LWDBs and CareerLinks use between 5% and 10% of their funds to provide transitional jobs and that they ensure that priority of service for transitional jobs is afforded to individuals who qualify for priority of service. (See, Proposed WIOA State Plan, p. 70) We strongly support this.

Response: We appreciate the comments in support of the plan’s overall focus, priority of service and career pathways provisions, and requirement to fund transitional jobs.

Community College of Allegheny County offered the following comments:

- Perkins - It is recommended that the Commonwealth separate Perkins from the state's combined WIOA plan. The current structure is efficient and effective; including Perkins with the WIOA plan will impose an additional bureaucratic structure and increase paperwork and reporting requirements, while at the same time, decreasing the amount of funds available to the training providers. Diverting even a small percentage to bureaucratic overhead harms students and clients of the workforce system.

Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re-evaluate the fit between Perkins and WIOA as federal guidance becomes available. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor's goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to include Perkins as part of the WIOA state plan.

- Board Subcommittees – It is recommended that community colleges be included on Board Subcommittees, including the Youth Committee (pp. 13-14) as the colleges have extensive experience serving youth aged 18-24.

Response: We appreciate the comment and encourage state Board members, of which two currently represent community colleges, to participate on the committees of interest to them.

- CCAC has been designated a Military Friendly college and we would be pleased to serve as a model or best practice.

Response: The commonwealth appreciates this comment and PDE looks forward to learning more about the best practices in place at CCAC.

- It is recommended that the Commonwealth use the Governor's set aside for business education partnerships with community colleges.

Response: The commonwealth appreciates this comment and will take it into consideration when making final decisions regarding use of the Governor's set aside funds.

Community College of Beaver County offered the following comments:

- The Commonwealth should separate Perkins from the state's combined WIOA plan:
 - Community colleges have a strong working relationship with PDE relative to the use of Perkins funds.

- Unclear what the benefit is of combining Perkins with the state WIOA plan.
- Imposes an additional bureaucratic structure and increase paperwork and reporting requirements, while at the same time decreasing the amount of funds available to the training providers.
- More demand for Perkins services than the existing appropriation can support, so diverting even a small percentage to bureaucratic overhead harms students and clients of the workforce system.
- Current structure is effective and efficient.
- Perkins is currently being considered for reauthorization in the U.S. Congress. Including Perkins in the WIOA plan may make it more difficult to comply when reauthorization is complete.

Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re-evaluate the fit between Perkins and WIOA as federal guidance becomes available. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor's goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to include Perkins as part of the WIOA state plan.

- Commonwealth should consider leveraging the experience and expertise of the community colleges in the workforce system, rather than concentrating funds in, and requiring decision-making to be run through the WIBs and CareerLinks. Community colleges have significant experience in serving the targeted populations and experience working with community partners to provide wrap around services. Community College of Beaver County has ongoing partnerships with area energy, advanced manufacturing, health-care, and technology-based companies in the region.

Response: The plan does seek to leverage the experience of expertise of community colleges as part of the workforce development system. WIOA Title I funds are required to be allocated to Local Workforce Development Boards who decide how funds are spent locally in alignment with federal and state laws, regulations and policies.

- Community colleges should be represented on Youth Committee when they share geography. Community college has extensive experience in serving youth aged 18-24 and building career pathways (First paragraph on pages 13 and 14).

Response: We appreciate the comment and note that Local Workforce Development Board membership is determined by local elected officials.

- Community colleges should be included on board subcommittees. (Page 57)

Response: We appreciate the comment and encourage state Board members, of which two currently represent community colleges, to participate on the committees of interest to them.

- The State should use the Governor’s set-aside for business education partnerships with community colleges.

Response: The commonwealth appreciates this comment and will take it into consideration when making final decisions regarding use of the Governor's set aside funds.

- Community College of Beaver County is designated as a veteran friendly campus while could serve as a model/best practice (page 51).

Response: The commonwealth appreciates this comment and the offer to serve as a model/best practice.

Community College of Philadelphia submitted the following comments:

- Page 8 - Goal 1: Establish Career Pathways: High Priority Occupation’s (HPO’s) and Entry-level occupations that lead to HPO’s – Community College of Philadelphia (CCP) would like to see the State be flexible around what they accept as entry-level jobs that lead to HPOs. Individuals with barriers for employment are often only able to enter at the lowest level and thus, these pathways need to recognize work history in a related field is important to leading them further into HPOs, and other educational opportunities. Also, CCP would like to see mention by the State of understanding emerging job growth areas and supporting proactive programs that get the State ahead of the data, which often reflects historical growth, rather than where trends are emerging locally or regionally. Allow for some experimentation here with institutional partners that are trying to align their programs with future needs in specific markets.

Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned. Local areas are able to petition for occupations to be added to the local HPO list based on documented employer demand in cases where data alone does not qualify the occupation for the HPO list. We also note that while the State Plan emphasizes and encourages high-quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high-quality jobs.

- Page 9 - Section 1.6 – Registered pre-apprenticeship and apprenticeship programs – Successful models have usually tapped into state community college and technical colleges

to connect employers to the populations most in need. More detail should be provided about the State's plan here. Consider utilizing community colleges as a resource for this important resource.

Response: We appreciate the comment and recognize that community colleges and technical schools often play an important role in Registered Apprenticeship programs.

- Page 9 - Section 1.7 – Will the State be looking at how HPOs vary by region and how they can support these differences?

Response: The commonwealth produces statewide and regional HPO lists in recognition of regional differences. The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned.

- Page 9 - Section 1.8 - Keep in mind FERPA requirements of students, and whether some EPTL's must protect this data. Consider ways that data can be collected without FERPA concerns.

Response: Confidentiality of students is of utmost concern to the commonwealth. Any data collection or reporting that is conducted will be vetted and reviewed to ensure FERPA compliance. Under FERPA, there are exceptions to data collection when the data is to be used for program evaluation, which these data collections would fall under. Therefore the commonwealth believes that the programs will be able to function without violating the provisions of FERPA.

- Page 10 – Section 1.10 – With some of these populations, work experience alone is important. Many employers may be creating lower wage jobs by up-skilling incumbent workers into other higher level positions. This model is important to encourage among employers because up-skilling incumbent workers helps employer with retention and productivity, thereby freeing up entry-level positions for the populations the State is trying to prioritize. These positions may not be on a specific pathway, but as noted many will stand out for further training into pathway positions once they are employed.

Response: We appreciate the comment and will consider it as we continue to define and establish career pathways.

- Page 11 - Section 2.3 – We encourage the State to include emerging growth trends by region as part of their expansion of the IP's. Some boutique industries may be very successful in certain areas, but might not rise to a statewide level.

Response: Thank you for the comment. The most recent IP grant availability allowed for proposals in all 12 industry clusters shown in the table on page 27 of the State Plan.

- Page 11 - Section 2.4 – Better alignment and expansion of IP and WEDnetPA programs – We would ask that the structure remain streamlined and continue utilizing the community colleges (CCs) and state universities (SUs) as the fiscal agents and training partners. Any expansion of the WEDnetPA program that comes with coordinating with USDOL needs to understand current issues of the program expressed by the existing partners (CCs and SUs) to DCED: DCED needs to address the underfunding of the administrative burden of the program (8%), which only covers a portion of the cost to administer it for the partners; Re-establish some funding to assist the WEDnetPA partners with the administrative burden and expand the amount of training the partners are able to perform (currently 35%, increase to 50%) to help offset that cost. This helps streamline for employers if they so choose to use the partner as their trainer; increase flexibility of program to include broader definitions within the sectors. Currently, if a business does not have a qualifying NAICS, it requires an exception even if the specific training is directly related to the eligible sectors covered by WEDNET. Exceptions are capped at 10%. We are finding many companies have blended activities that are qualifying, but if they utilize a NAIC code from their original founding, they are pushed into the exception. We've had several professional firms who are now running technology arms of their business, and some processing and mechanical firms that are undertaking manufacturing that have been pushed into the exception and have not been able to access as much training funding as they could be eligible for if there were broader definitions.

Response: Thank you for your comments, however the WIOA plan is not impacted by the issues noted. The College should contact the WEDnetPA program coordinator to discuss.

- Page 11 - Section 2.6 – CCP is involved with Philadelphia Works on this effort and is looking forward to what will develop. We ask that the State remain flexible in its approach, as this is a learning process and we may find adjustments need to be made as we get employer feedback.

Response: We appreciate the comment and look forward to continuing to work with CCP and Philadelphia Works on this project.

- Page 11 - Section 2.8 – Community Colleges are frequently working with the State's priority populations on a daily basis and we see ourselves as an important front-line provider of training (credit and non-credit) that leads individuals towards careers and improved economic circumstances. We fully support the State's innovative approach to partnering directly with educational institution to support job seekers and employer needs. We would like the State to view the Community Colleges as an important preferred provider of training in key priority areas of economic growth, particularly in emerging fields in their local

economies. This model is utilized by other states that have closely aligned their economic development and workforce structures.

Response: The commonwealth also views the community colleges as a frontline training provider. The plan highlights a number of initiatives where the commonwealth has partnered with the community colleges to provide training and create career pathways. These opportunities will continue under the WIOA combined state plan.

- Page 13 & Item 3.3 on Page 14 - We ask the State consider that community colleges be represented on Youth Committee when they share geography. CCP serves youths in both the 14-18 year old and 18-24 year old populations.

Response: We appreciate the comment and note that Local Workforce Development Board membership is determined by local elected officials.

- Page 15 - Goal 4 – The plan discusses low-quality jobs and high quality jobs, but the plan does not provide definitions of what qualifies for each. With respect to many of the populations the plan is prioritizing, often individuals may only qualify for these entry level positions that may be considered low-quality. However, if they are connected to career pathway HPOs, these should be considered. Also, there are some employers who may offer reasonable wages, benefits, tuition reimbursement, but the jobs may be considered low-quality. What about such partners that may provide all the above, but are training OSY's in jobs initially deemed low-quality – laundries, caterers, retail, etc. – giving them essential work skills and an employment history? These can be important stepping stones for individuals to get on the right path towards more ambitious jobs. For certain populations, there may be a role if there is a clear connection to employability for the hardest to serve.

Response: We appreciate the comment and recognize some subjectiveness in the term "high-quality jobs," although the plan outlines characteristics of high quality jobs (reasonable wages, benefits, full-time stable employment, advancement opportunities, etc.) in the introductory language under Goal 4. While the State Plan emphasizes and encourages high-quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high-quality jobs.

- Page 40 - DOC Coordination – As an institution committed to helping Philadelphia address its returning citizens (re-entry) population, we encourage greater coordination and inclusion of innovative community college programs to help these individuals earn degrees, learn career skills, and gain employment.

Response: We appreciate the comment and agree that coordination with community colleges is important.

- Page 39-40 - Keystone Education Yields Success (KEYS) - Currently, CCPs service a minimal cohort of students below the age of 21, and have not coordinated with WIOA Youth Service

Providers. If we can expand in this area programmatically, it could allow us to leverage WIOA funds for wage subsidy, which could positively impact our job placement, and potentially improve our performance goals in this area.

Response: DHS supports the coordination of DHS programs with WIOA programs. DHS will continue to refer TANF and SNAP recipients enrolled in or interested in enrolling in the community college to the KEYS program.

- Page 43 and 51 - Dept. of Military and Veterans Affairs – CCP is designated as a veteran friendly campus and has a dedicated Veterans Resource Centers and we would encourage more direct partnerships between DOL and Community Colleges on this priority population to be a best practice model for the State.

Response: The commonwealth appreciates this comment and the offer to serve as a model/best practice.

- Page 49 - Engagement with Educational Institutions – We are encouraged and support the increased direct engagement with educational institutions and would like the State to see CCs as a frontline preferred training provider, particularly in developing internal programs that help industries build pipelines of entry-level and middle skill workers. We would like to see the State provide assistance in helping CCs institutionalize efforts that are funded by major grants so that the expertise remains in-house.

Response: The commonwealth does view the community colleges as a frontline training provider. The plan highlights a number of initiatives where the commonwealth has partnered with the community colleges to provide training and create career pathways. These opportunities will continue under the WIOA combined state plan.

- Page 52 – PA TIP – Can the State consider expanding the program to include non-credit certificate programs offered at community colleges? The program should also cover more health care occupations due to the vital importance of this industry to Philadelphia’s economy.

Response: We appreciate this comment and will reach out to the Pennsylvania Higher Education Assistance Agency (PHEAA), which administers the PA-TIP program, to discuss this request.

- Page 52-53 - Coordinating with Economic Development Strategies – States with employer responsive and supportive programs generally have robust ties between economic development strategies and community colleges as training partners. We would welcome a greater coordination among DOL and DCED programs and supports to employers via direct customized job training through community colleges. This mentions that joining the PREP will include community colleges, Career Links and LWDBs. PREP currently provides funding to its PREP partners. Does the expanded version include funding for the added partners, and

if so, what would that help support? As mentioned, CCs and SUs provide administrative support of WEDnetPA, well in excess of the 8% administrative fee we are allowed to charge. We would welcome support of the administrative time we spend on this and other economic development programs the State is seeking for us to promote to employers. Utilizing an additional CRM database on top of current one will add additional cost and coordination. Will the State provide for free to partners?

Response: The community college is considered a service provider within the workforce development environment. As an anticipated participating provider in the PREP network, the community college will improve collaboration within their respective service area using the available CRM. This is a key WIOA goal. The commonwealth will work with workforce and economic development partners to provide CRM tools that are cost effective and efficient. With respect to the PREP CRM, the commonwealth has, and plans to continue, to pay these costs. DCED does not anticipate a significant additional burden relative to the use of the available CRM.

- Page 53 - Keystone Education Yields Success (KEYS)— Emphasis must also be placed on employment opportunities, VWE/Internships, and High Priority Occupations as a KEYS Program focus. These concentrations also place us in the position of partnership development, and relationship managers- evidenced by our employer and community service network.

Response: Obtaining employment is the anticipated outcome for all individuals seeking postsecondary credentials. KEYS can be an important contributor to that outcome. If internships are part of the program, that would be a great benefit to the students.

- Page 57 - Board Subcommittees - Recommend that community colleges be included on board subcommittees.

Response: We appreciate the comment and encourage state Board members, of which two currently represent community colleges, to participate on the committees of interest to them.

- Industry Partnerships – Community Colleges have our own business education partnerships. Community Colleges used to be administrators of some Industry Partnerships. There can be a lot of overlap for employers between the IPs and employer advisory boards for the community colleges. We would suggest that a portion of the Governor’s set aside be used to support partnerships at the community college level. If the IP model remains the same, we would encourage the State to emphasize to the IP organizing entity that the area community colleges can tap into these groups more directly. This might decrease the amount of overlap among employers being tapped for these numerous committees.

Response: We appreciate the comment and encourage Industry Partnerships to consider community colleges as partners to the degree they are not already involved.

- Page 83 -89 - Youth Activities - There should be a concerted effort to fund programs for OSY and basic skill young adults (ABE, GED, and ESL) that will concurrently enroll and accelerate them to secondary and postsecondary credential attainment. These program models (such as Gateway to College) provide over-aged/under-credited or credentialed youth and young adults who need additional supports to reach educational goals and attain jobs at an accelerated pace, effectively "catching up" those individuals who have fallen behind. A focus on dually-enrolling these individuals into programs that address/support low literacy and numeracy skills and limited credits toward high school completion with the end goal of an industry-recognized postsecondary credential leading to employment can make a real impact in addressing the educational and employment barriers these individuals face.

Response: The commonwealth will explore models and funding options for integrated education and training and other accelerated learning opportunities for the populations identified in the comment.

- Page 221 - REO Program – The plan makes no mention of whether Community Colleges are eligible to apply for the REO program. They should be eligible as a major provider of assistance to get these individuals employed. Or community colleges should at least be considered for the innovative strategies.

Response: The US Department of Labor offers REO funds directly to applicants. The commonwealth plays no role in determining what entities are eligible for REO funding.

- Page 264 - Leverage local, federal and philanthropic funds for workforce development – Having the Governor convening with Philanthropy on workforce development is important, and very supported by community college, as this is a high priority only for a select number of private philanthropies.

Response: We appreciate the comment in support of our plans to seek philanthropic funds to support our efforts.

- We recommend that the Commonwealth separate Perkins from the State's combined WIOA plan. The benefit of combining Perkins with the Commonwealth's WIOA plan is unclear and the current structure is effective and efficient. This likely will impose an additional bureaucratic structure and increase paperwork and reporting requirements, while at the same time decreasing the amount of funds available to the training providers. There is already more demand for Perkins services than the existing appropriation can support. Diverting even a small percentage of funding to overhead harms students and clients of the

workforce system. Perkins is currently being considered for reauthorization in the U.S. Congress. Including Perkins in the WIOA plan may make it more difficult to comply when reauthorization is complete. The College has a strong working relationship with PDE relative to the use of our Perkins funds.

Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re-evaluate the fit between Perkins and WIOA as federal guidance becomes available. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor's goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to include Perkins as part of the WIOA state plan.

- The College recommends that the Commonwealth consider leveraging the experience and expertise of the community colleges in the workforce system, and consider providing funds directly to community colleges. Community colleges have significant experience in serving the targeted populations and in working with community partners to provide wrap around services. The College also has good working relationships with employers in the local community. Concentrating funds in, and requiring all decision-making to be run through the Workforce Development Boards and CareerLinks, potentially leads to dilution of the funds into training and instead goes towards other administrative costs.

Response: The plan does seek to leverage the experience and expertise of community colleges as part of the workforce development system. WIOA Title I funds are required to be allocated to Local Workforce Development Boards who decide how funds are spent locally in alignment with federal and state laws, regulations and policies.

Community Legal Services and the Community Justice Project offered the following comments:

Community Legal Services and the Community Justice Project submit these comments on behalf of our clients in strong support of the Wolf Administration's proposed Workforce Innovation and Opportunity Act (WIOA) state plan, which was published for public comment on December 28, 2015. Our comments here focus on the importance of using the full amount of funding designated for Transitional Jobs (subsidized employment).

Need for Transitional Employment

WIOA allows states to spend up to 10% of Title I funds on transitional employment opportunities for participants. The proposed WIOA state plan includes a requirement that LWDBs and CareerLinks use between 5% and 10% of their funds to provide transitional jobs, especially to individuals who qualify for priority of service. (See, Proposed WIOA State Plan, p. 70) We strongly support this.

Access to transitional employment for low-income Pennsylvanians is essential to address persistent unemployment and high poverty rates across the Commonwealth. While the overall Pennsylvania unemployment rate has fallen considerably since the recession, persistent unemployment remains a serious problem for many people. 26% of Philadelphians live in poverty – the highest rate of any large city in the nation – while 33 counties in Pennsylvania have poverty rates of 13% or higher. Transitional jobs set people up for long-term employment by helping them “get a foot in the door” of workplaces, revitalizing Pennsylvania’s economy while helping people move out of poverty. Transitional jobs are especially critical for low-income individuals who lack work experience and/or face significant barriers to becoming employed. When compared to individuals receiving only pre-employment services, individuals placed in transitional jobs have better long-term outcomes including significant increases in earnings.

Additionally, investing in transitional jobs leads to cost-savings for the state. One study of transitional jobs in New York found cost savings of \$106 million over three years after subtracting the state’s initial \$47 million investment. Prioritizing investment in transitional jobs is thus a cost-effective means of connecting people facing persistent employment barriers to the workforce. Pennsylvania has had several successful transitional jobs programs in the past. Most recently, the Way to Work program connected more than 25,000 Pennsylvanians to employment during the recession. Over 4,600 employers, including a third from the private sector, participated and were able to hire quality workers at a reduced cost. Sandi Vito, the Secretary of the Pennsylvania Department of Labor & Industry at the time, stated: “I cannot stress enough the positive effect this program has had on the lives of unemployed Pennsylvanians.” It is time for Pennsylvania to again prioritize transitional jobs. Through dedicated WIOA funding, combined with funding from other sources, Pennsylvania can build a transitional jobs program that will tackle the persistent unemployment faced by particularly vulnerable Pennsylvanians, helping them become stable while building pathways to long-term employment.

Target Populations for Transitional Employment

WIOA places special importance on serving high needs groups. According to WIOA, priority for individualized career services and training services must be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient. Certain groups within these priority categories face particular barriers to employment that make a transitional jobs program especially critical. Virtually all persons in the following target groups fall within the WIOA definition of “other low-income individual” and are therefore entitled to priority of service.

People with criminal records: Even for individuals with old and minor records, finding employment can be a challenge. People with recent criminal records and those on active probation and parole face even greater barriers to finding work. In Pennsylvania, over 250,000 people per year are on active supervision. A year after returning home from prison, 60% of people remain unemployed. Getting connected to employment quickly upon returning to the community is one of the best ways to prevent recidivism. For example, one study showed that participants in a transitional jobs program were significantly less likely than the control group to have been arrested, convicted for a new crime, or incarcerated three years after entering the program. Once people with criminal records are able to connect to the workforce, employers are more likely to feel comfortable continuing to employ them.

Future employers will also be more likely to employ people with criminal records who have strong relevant work experience and positive references.

Youth: The youth unemployment rate is at least three times higher than the adult rate, and nearly 30% of Philadelphians aged 16 to 24 are unemployed. Even for youth who do not have juvenile or criminal records, finding employment is tough, especially without prior work experience or references. For young parents, the challenges to connecting to the workforce are even greater. By accessing transitional jobs, young people are able to build critical work experience, skills, and connections, which greatly increase their ability to move on to long-term employment and ultimately move themselves and their families out of poverty. Recipients of income supports: The end of the General Assistance cash assistance program in 2012 shredded Pennsylvania's safety net for people facing barriers to employment. Particularly impacted by these changes are people with disabilities who face difficulty finding employment, yet do not qualify for SSI or other benefits programs. Additionally, because of federal SNAP (food stamp) rules, more than 30,000 childless adults without disabilities are at risk of losing SNAP benefits in 43 Pennsylvania counties beginning in June 2016 unless they can find qualifying work. Connecting these vulnerable groups to transitional jobs will allow them to develop an income stream, retain vital benefits, and stabilize their lives. By becoming more financially stable in the short-term, these individuals will be more prepared to transition to permanent employment in the long-term.

Conclusion

We thank the Administration for including in the state plan that 5%-10% of funds will be used for transitional employment. We believe that utilizing the full amount of funding possible to create transitional jobs is essential, both to provide badly needed income to people living in poverty and to provide pathways to long-term employment, especially for those who have faced significant barriers to becoming employed.

Response: We appreciate the comments in support of transitional employment opportunities and the requirement that local areas fund them. We agree that individuals with criminal records, youth and recipients of income supports are often well-suited for transitional employment opportunities.

Rich Krankota, Director of Veteran Services for **Crawford County** offered the following comments:

- Training Benchmarks (p. 10: State will establish benchmarks for how much WIOA Title 1 funding must be used for training by local areas): While there is certainly value to up-skilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of

benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- Priority of Service Benchmarks (p. 68: State will monitor data reported to determine the percentage of those served who are individuals with priority of service and barriers to employment): Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. This will have a significant impact on the local area's ability to meet the critical needs of dislocated workers from Joy Mining, General Electric Transportation Services (GETS), and other employers that are experiencing reductions in the workforce.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- Transitional Jobs (p. 70: Local Workforce Development Boards will be required to use between 5-10% of Title 1 funds to provide transitional jobs and ensure that priority of service for transitional jobs is afforded to individuals who qualify): NW PA WDB applied and received funding from the Workforce Innovation Fund (WIF) federal grant program to target the population described in this section of the State plan as priority of service. The requirement to spend Title 1 funds for this group will negatively impact the ability of staff to meet the goals of the federal program. Flexibility in the state plan for the local board to determine how or what funds are used to meet the requirements is advised. Additionally, the need to get approval from the commonwealth to transfer funds from Title 1-B funds from Adult to the Dislocated Worker Program will negatively impact our ability to be responsive to the needs of dislocated workers in the area such as GETS and Joy Mining.

Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs. Regarding transfer of Title I funds, the commonwealth will review requests to transfer funds as quickly as possible to ensure service delivery is not disrupted.

- Employer Services (p. 24-25) (p.67) and throughout the plan: A definition of High Quality Jobs is necessary to determine the focus of employer services. Recognizing that many of the openings are low end and replacement for turnover and not going deeper into the data is a concern. There are many job seekers that do not have the skills for a higher level position and employers that need to fill these positions in order to vet a new employee that may move up a career pathway/ladder. Also this is cause for concern in prioritizing employers for services that they are begging to have.

The plan, in general, does not cover many employer services. The focus is on the funding which follows the job seeker and is targeted (70%) to those with barriers to employment and prioritizes three areas 1) recipients of public assistance 2) other low income individuals and 3) individuals who are basic skills deficient.

Response: We appreciate the comment and recognize some subjectiveness in the term "high-quality jobs," although the plan outlines characteristics of high quality jobs (reasonable wages, benefits, full-time stable employment, advancement opportunities, etc.) in the introductory language under Goal 4. While the State Plan emphasizes and encourages high-quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high-quality jobs. We also agree with the commenter that the workforce development system can only be successful if it is responsive to the needs of employers. Goal 2 focuses on developing a pipeline of workers to meet industry needs and Goal 4 speaks to engaging employers and being responsive to their needs.

- Data Collection (p. 18 comments 5.1 through 5.7) ROI & Market Penetration (p. 32 table): While we recognize the importance to protecting data, as a local partner the WDB will need to utilize the information to make local decisions that are not necessarily interesting to the commonwealth. The state plan does not clarify what access the local board will have to the data. In addition the definition for ROI and Market Penetration are not clear. If employers are not eligible because they do not qualify for services due to high turnover or low wages (p. 29) it will be impossible to meet the imposed requirements. We encourage the commonwealth to share the raw data with the local areas so that improvements in the system can be made.

Response: The commonwealth must ensure the integrity and security of data among all partners and programs. As the volume and diversity of workforce data grows, so too do the opportunities and challenges of sharing information among all involved. We are committed to expanding access within the parameters outlined by statutes, regulations, and policies that govern the release of this data. Additional clarity for the ROI and market penetration measures will be provided once final WIOA regulations are released.

- High Priority Occupations (HPO) List and High Turnover Positions (p. 24-25): It is admirable that the commonwealth wants to reduce the high turnover rates and focus on retention, but without a change in the method for developing the HPO list it will be nearly impossible. Given the principle of consumer choice used at the PA CareerLinks® it is unlikely that we will experience a reduction in the number of individuals requesting training that is on the HPO list to focus on positions where the turnover is low.

Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned.

- Workforce Development System-Alignment Strategy (p. 29) : This is an area that can be improved in the PA CareerLinks® and I am pleased to see that the commonwealth recognizes the need. Each partner in the PA CareerLinks® should be willing to serve each client that enters and share the information with all professionals employed in the site.

Response: We appreciate the comment in support of this effort.

Brenda Wait from the **Crawford County Assistance Office** submitted the following comments:

- Training Benchmarks (p. 10: State will establish benchmarks for how much WIOA Title 1 funding must be used for training by local areas): While there is certainly value to up-skilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- Priority of Service Benchmarks (p. 68: State will monitor data reported to determine the percentage of those served who are individuals with priority of service and barriers to employment): Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. This will have a significant impact on the local area's ability to meet the critical needs of dislocated workers from Joy Mining, General Electric Transportation Services (GETS), and other employers that are experiencing reductions in the workforce.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- Transitional Jobs (p. 70: Local Workforce Development Boards will be required to use between 5-10% of Title 1 funds to provide transitional jobs and ensure that priority of service for transitional jobs is afforded to individuals who qualify): NW PA WDB applied and received funding from the Workforce Innovation Fund (WIF) federal grant program to target the population described in this section of the State plan as priority of service. The requirement to spend Title 1 funds for this group will negatively impact the ability of staff to meet the goals of the federal program. Flexibility in the state plan for the local board to determine how or what funds are used to meet the requirements is advised. Additionally, the need to get approval from the commonwealth to transfer funds from Title 1-B funds from Adult to the Dislocated Worker Program will negatively impact our ability to be responsive to the needs of dislocated workers in the area such as GETS and Joy Mining.

Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs. Regarding transfer of Title I funds, the commonwealth will review requests to transfer funds as quickly as possible to ensure service delivery is not disrupted.

- Employer Services (p. 24-25) (p.67) and throughout the plan: A definition of High Quality Jobs is necessary to determine the focus of employer services. Recognizing that many of the openings are low end and replacement for turnover and not going deeper into the data is a concern. There are many job seekers that do not have the skills for a higher level position and employers that need to fill these positions in order to vet a new employee that may move up a career pathway/ladder. Also this is cause for concern in prioritizing employers

for services that they are begging to have.

The plan, in general, does not cover many employer services. The focus is on the funding which follows the job seeker and is targeted (70%) to those with barriers to employment and prioritizes three areas 1) recipients of public assistance 2) other low income individuals and 3) individuals who are basic skills deficient.

Response: We appreciate the comment and recognize some subjectiveness in the term "high-quality jobs," although the plan outlines characteristics of high quality jobs (reasonable wages, benefits, full-time stable employment, advancement opportunities, etc.) in the introductory language under Goal 4. While the State Plan emphasizes and encourages high-quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high-quality jobs. We also agree with the commenter that the workforce development system can only be successful if it is responsive to the needs of employers. Goal 2 focuses on developing a pipeline of workers to meet industry needs and Goal 4 speaks to engaging employers and being responsive to their needs.

- Data Collection (p. 18 comments 5.1 through 5.7) ROI & Market Penetration (p. 32 table): While we recognize the importance to protecting data, as a local partner the WDB will need to utilize the information to make local decisions that are not necessarily interesting to the commonwealth. The state plan does not clarify what access the local board will have to the data. In addition the definition for ROI and Market Penetration are not clear. If employers are not eligible because they do not qualify for services due to high turnover or low wages (p. 29) it will be impossible to meet the imposed requirements. We encourage the commonwealth to share the raw data with the local areas so that improvements in the system can be made.

Response: The commonwealth must ensure the integrity and security of data among all partners and programs. As the volume and diversity of workforce data grows, so too do the opportunities and challenges of sharing information among all involved. We are committed to expanding access within the parameters outlined by statutes, regulations, and policies that govern the release of this data. Additional clarity for the ROI and market penetration measures will be provided once final WIOA regulations are released.

- High Priority Occupations (HPO) List and High Turnover Positions (p. 24-25): It is admirable that the commonwealth wants to reduce the high turnover rates and focus on retention, but without a change in the method for developing the HPO list it will be nearly impossible. Given the principle of consumer choice used at the PA CareerLinks® it is unlikely that we will experience a reduction in the number of individuals requesting training that is on the HPO list to focus on positions where the turnover is low.

Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned.

- Workforce Development System-Alignment Strategy (p. 29) : This is an area that can be improved in the PA CareerLinks® and I am pleased to see that the commonwealth recognizes the need. Each partner in the PA CareerLinks® should be willing to serve each client that enters and share the information with all professionals employed in the site.

Response: We appreciate the comment in support of this effort.

The **Cumberland County Library System** offered the following comments:

- I have reviewed the Strategic Planning Elements of Pennsylvania’s WIOA Combined State Plan. I am writing to you as a public librarian. I’ve worked in libraries on either ends of the financial spectrum: for 12 years at an economically distressed library in Pottsville, PA and for 23 years at one of the state’s most successful library systems in Cumberland County, PA. My current position has allowed me to become knowledgeable about the needs of our local Cumberland County work force and employers, plus the services offered by local educators and work force development agencies. Specifically:

Goal 1: Establish career Pathways: On page 9, point 1.3, the draft plan mentions combining education, training, counseling and support services from a variety of sources. Many of the commonwealth’s public libraries offer online educational databases that provide training in specific skill areas (e.g. Lynda.com) or offer practice tests and tutorials that help learners complete employment/skill tests (e.g. Learning Express or Cengage’s Testing and Learning Resource Center database). These resources should be included in lists of resources available to learners (page 9, point 1.8), and also be correlated to badge, micro-credentialing or entry-level programs (mentioned on page 10, point 1.9).

Response: We appreciate the comments about the resources offered to jobseekers through the library.

- On page 10, point 1.11, the draft plan mentions enhancing career guidance and navigation services. Libraries offer career guidance resource materials (such as books and ebooks) and career guidance databases that provide information and support. These resources could be expanded and promoted by the commonwealth, and reach many the plan’s targeted constituencies. In addition, the commonwealth could provide libraries with password protected access and training for any statewide proprietary databases that would help support workforce development goals.

Response: We appreciate the comments about the career guidance resources offered to jobseekers through the library and we will seek ways to better utilize libraries within the workforce development system.

- Goals 2: Invest in Talent in Strategic Partnership with Employers and Educational Institutions (page 10) I would comment here that libraries should be included in these “Strategic Partnerships”. Over the last year, the Cumberland County Library System has collaborated with county officials, workforce development agencies and employers to discuss the needs of our area. These discussions have introduced our partners to the strategic role that libraries play in supporting and assisting those who are seeking new or better employment, and reinforced the perception that libraries offer a unique broad-based network in the county that provides residents with one-on-one help to address information needs, supporting resources (e.g. books, ebooks and online databases), free public Internet computers, and training offered from our local public meeting rooms. This enhances everyone’s ability to reach local communities, and doesn’t require people to travel to the county seat.

Response: We appreciate the comments about the strategic relationships involving the library and workforce partners locally.

- On page 11, point 2.5 the draft plan mentions expanding access to online education and training programs. All of Pennsylvania’s public libraries have publicly accessible (free) Internet computers and nearly all have Wi-Fi hotspots that can be used to access supported training. Many also have public meeting spaces that could accommodate local training sessions (in-person and online). I would like to recommend that you consider working with Commonwealth Libraries to leverage the power of libraries, both in purchasing online educational/training databases or resource materials (print or digital) and in providing training for librarians in how to better support residents’ employment questions.

Response: We appreciate the comments about libraries that offer online training, meeting spaces for training and the value of statewide purchase of electronic resources for jobseekers and we will seek ways to better utilize libraries within the workforce development system. We did make further reference to libraries as system partners on pages 11, 42 and 48 of the final State Plan.

- On page 12, point 2.11 the draft mentions developing integrated education and training models for people lacking a high school diploma or need more skills. Often transportation is a barrier for many people needing training, again libraries could play a role in being a more accessible training site.

Response: We appreciate the comments about the library's potential as a more convenient training location.

- Goal 3: Increase Work-Based Learning Opportunities for Youth - Again libraries could serve as a site for youth workforce development trainings. Libraries also share an interest with the commonwealth in introducing high-risk out-of-school youth, especially very young parents, to the support that is available from the public library to not only help themselves, but also their children with early literacy training.

Response: We appreciate the comments about the library's potential as a convenient training location for out-of-school youth.

- On page 15, point 3.12 the draft discusses the Office of Vocational Rehabilitation efforts to reach more people with its services. Again, libraries could provide an ideal location for promoting these services, either through promotional literature, or on-site workshops.

Response: We agree that libraries are a valuable, yet sometimes underutilized local community resource, and we will promote their use by job seekers, including individuals with disabilities, as an access point to workforce development resources.

- Additional General Comments: During my library system's collaborations this past year with employers, workforce development agencies, educators and county officials, I have learned that:
 - Our county's parents generally seem to have a "got to go to college" attitude. This has not served our employers who offer family-sustainable wages in the 'trades' well, because vocational or technical educational paths are stigmatized/marginalized. As a result, Cumberland County does not have a sufficient number of people with these kinds of skills coming into the workforce. We seem to have too many college graduates. Our employers and educators alike believe that we need to promote the value of vocational-technical education with parents who have children as young as in fifth grade, before college path decisions are made. They comment that by the time kids are in high school, the decision has already been made. Libraries have been discussed as potential sites for programs with parents about the value of vocational education. In short, vocational/career/technical education needs an image makeover.
 - Mechanical, manufacturing and problem-solving skills are in short supply
 - Soft skills among younger employees (under age 30) are in short supply. (work ethic, team work and basic life skills)
 - In addition, access to quality child care is also a problem for employees, especially those new to working.

Response: We appreciate your comments about your county's perspective on career preparation and a broader role for vocational and technical education, and libraries supporting these students. Regarding child care, DHS continues to enhance the child care options available to working parents. The STARS program is a program that encourages and rewards child care centers that hire excellent staff and participate in ongoing training.

- Summary: I believe that Pennsylvania's public libraries (more than 660) have a broad state wide network that touches many local municipalities, both at the county level and at local borough and township levels. This network is uniquely positioned to help support the needs of those who are seeking new or better employment in our state. With the right level of support, libraries could help the state meet its workforce development goals and extend the reach of CareerLink offices and county workforce development agencies/schools. Libraries offer publicly accessible (free) Internet computers and Wi-Fi hotspots that could be used to access supported training. Many also have public meeting spaces that could accommodate local training sessions (in-person and online). Libraries across the state offer supporting resource materials (such as books and ebooks) and online databases that provide training in specific skill areas (e.g. Lynda.com) or practice tests and tutorials to help learners complete employment/skill tests (e.g. Learning Express or Cengage's Testing and Learning Resource Center database). Finally, and most importantly, libraries offer librarians. These are people who are trained to offer residents one-on-one help with finding the best resources to meet their needs, be it a printed book, an ebook, a training program, or an online database resource. Therefore, I would like to recommend that your agency consider working with Commonwealth Libraries to leverage the power of our state's public libraries, both in acquiring online educational/training databases or resource materials (print or digital) that would be accessible to residents in 660+ strategically located facilities across the state and in providing training to librarians in workforce development needs/issues.

Response: We appreciate the comments about how libraries assist jobseekers with basic computer skills, access to the Internet, and access to educational resources and made further reference to libraries as system partners on pages 11, 42 and 48 of the final State Plan.

Delaware County Community College offered the following comments:

- Pg. 8 - Section 1.2 (also mentioned on pg. 49): Local Workforce Development Boards (LWDBs) will develop career pathway programs meeting the requirements of WIOA. Career pathway programs will include adult basic education (literacy and numeracy, English-as-Second Language, and high school equivalency instruction) and will permit participants to enter at any of these levels in addition to entering at the postsecondary level.

COMMENT: We do not believe that LWIDBs should be responsible for or have the authority to develop education and training pathways. This activity should be driven by collaboration between secondary and post-secondary education partners, who routinely include employers on program advisory boards and are attuned to current and emerging high-demand occupations as well as specific employer needs for skilled workers. In turn, the education and training pathways would be presented to the LWIDB in their region. While the workforce investment system should certainly have input, they are NOT the experts in training, delivery, and education and should not have the authority to impose those requirements on the education and training providers.

Response: We appreciate the comment and will revise the plan to state that LWDBs will lead the development of career pathways, in coordination with employers, multi-employer workforce partnerships and secondary and postsecondary education providers.

- Pg. 9 – Section 1.7: The commonwealth will continue to refine the High Priority Occupation (HPO) process and list to ensure career pathways are aligned to occupations that are in-demand, have higher skill needs and are likely to pay family-sustaining wages. The commonwealth will consult with LWDBs and engaged employers to accomplish this goal. The commonwealth will also support placement of individuals with barriers to employment into quality entry-level jobs that provide the work experience and non-technical skills necessary to lead to employment in HPOs, and we will consult with LWDBs and engaged employers to identify the career pathways for which such quality entry-level jobs can serve as “on ramps.”

COMMENT: The process of challenging the HPO for a local area or region is difficult. In order for the partners to be more responsive to the needs of their region, it is important that the process not be too cumbersome that providers choose not to pursue the appeal, thereby leaving employers without a workforce pipeline that relies on an aligned training program.

Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned.

- Pg. 14, Section 3.3: The commonwealth has established a Youth Committee as a standing committee of the State Workforce Development Board, comprised of individuals with expertise in youth workforce and education issues, which will advise on statewide youth policy and programs and provide technical assistance to LWDBs and their youth standing committee.

COMMENT: Community colleges should be represented on both the Youth Committee at both State and at local levels, since they have extensive experience in serving out-of-school youth ages 18-24.

Response: We appreciate the comment and encourage state Board members, of which two currently represent community colleges, to participate on the committees of interest to them. Local workforce development board membership is determined by local elected officials.

- Pg. 52 – Improving Access to Post-secondary Credentials: All training providers seeking inclusion on the ETPL will be required to describe the credential(s) to be earned. All Perkins postsecondary recipients report on credential, certificate or degree earned as part of their required accountability measures.

COMMENT: There needs to be an accreditation/validation process established to become an eligible training provider. Public funds will not be spent wisely if students are able to choose training based on a sales call or pitch. There needs to be set standards that demonstrate the provider's ability to educate and train. Suggestions for assessment include: (1) periodic curriculum review by an advisory board of local employers; (2) competency assessment; (3) a determination of the qualifications of the training staff that include years of training and education levels and industry-recognized certifications and credentials; and (4) a determination of whether the cost for training is reasonable and in line with tuition and fees of other training providers, particularly public LEAs and IHEs? It is critically important that CareerLink personnel understand that programs delivered at community colleges provide the most comprehensive and affordable route for individuals seeking training or re-training. Using community colleges as the primary source of training represents a direct taxpayer benefit by using public funds to provide educational opportunities that are cost effective and comprehensive in the services that are provided.

Response: The State Plan's draft regarding "improving access to post-secondary credentials" is consistent with WIOA and the instruction the Governor has developed for training provider and program eligibility (Workforce System Policy (04-2015) Eligible Training Providers – Initial Implementation of the Workforce Innovation and Opportunity Act). This policy provides the criteria and procedures required for determining training provider and program eligibility for receiving Title I-B funds in Pennsylvania (which includes, among many criteria factors, standards of performance and demonstrated effectiveness). Additionally, much of the information used in determining training provider and program eligibility is then organized and made available to the public (through the ETPL and the LTPL described in the eligible training provider policy) for informing consumer-choice in the selection of training providers and programs.

- Pg. 58 – How other one-stop partner programs will be assessed each year: The PA CareerLink® operator plays an instrumental role in assessing all one-stop partner programs. Beyond traditional program-specific performance metrics, the operator will consider how well all of the one-stop partner programs coordinate and integrate service delivery, promote the seamless transition of customers from one partner to another and demonstrate the capacity to meet the needs of customers accessing the PA CareerLink® system. Program-specific performance is addressed in the response to the effectiveness of programs in the preceding two-year period question that follows.

COMMENT: What background/ experience does the Pa CareerLink operator have with program development and assessment?

Response: It is the responsibility of the Local Workforce Development Board to procure the one-stop operator, ensuring through the Request for Proposal review process that the candidates for Operator have appropriate background and experience with program development and assessment.

- Pg. 65 - The commonwealth currently has a data system, WDQI, which incorporates all Department of Labor workforce program data, Unemployment Compensation (UC) wage record data, and TANF and SNAP participant data from Pennsylvania's Department of Human Services. The proposed plan is to incorporate Adult and Basic Literacy Education and Office of Vocational Rehabilitation data as well. In addition, the Department of Education (PDE) is working to integrate its current pre-k through grade 12 statewide longitudinal student level data into WDQI and develop more robust postsecondary data. This will enable the production of performance metrics via one data platform with reporting and analysis capabilities.

COMMENT: There needs to be shared responsibility for performance reporting. Successfully completing, obtaining, and retaining employment is an effort shared by both the CareerLink staff and the training provider. Currently, however, it is only the training provider who is responsible for gathering employment data and is penalized if performance data including wage records is not provided. A true partnership would share this responsibility. Providers should be able to submit participant identification to the CareerLink and through the WDQI wage records accessed for verification. Personal information disclosures are a part of the application process.

Response: While we appreciate your comments, the purpose of WDQI is to measure program outcomes rather than act as an employment verification system.

- **Performance Exemption for Credit Courses/Programs:** A change requiring accredited colleges and universities to submit performance data for college CREDIT programs would present an extreme hardship on the institution and negatively affect the number of HPO programs that would be available to Adult and Dislocated Workers. While there is an expectation by the LWDBs that CareerLink-funded students will complete their program requirements in a specified period of time, most students enrolled in community college credit programs do not progress at the same speed as noncredit programs. Some students take courses full-time; however, many students are part-time depending on their ability to pay tuition, work around personal obligations like children and jobs, or have to postpone schooling for any number of reasons. There is no “typical” community college student. To evaluate performance of a community college based on all students in that program and their ability to complete, in a non-associated agency's imposed mandated time frame, is not realistic. Additionally, the proposed performance measures do not account for the many intangible benefits of college credit programs outside of the actual certificate itself, including the ability of the student to then transfer credit towards a higher degree and being able to enroll in courses such as credit internships and co-ops that generally lead directly to employment.

As a result of these variables, it is more likely that one of two things will occur. Community colleges may decide not to submit CREDIT certificate programs because of the excessive burden of the performance measures. Or, because of the unattainable metric, credit programs will fall short of the performance measures and they will come off of the list of approved options. Either instance would potentially force students to go to private or for-profit schools that often charge more than the allotted ITA cap provides, thereby forcing students to take out student loans.

Response: Collection of performance data for all eligible training providers is a federal requirement for which the commonwealth is unable to provide a waiver. The commonwealth is committed to identifying ways we can meet the federal requirement and ensure workforce program participants have access to a robust list of training opportunities.

- **KEYS Program:** The KEYS program has been a successful program at community colleges for the past 10 years. There is no need to provide an additional layer of bureaucracy by channeling oversight of the programs through the LWDBs. That only reduces funding that would otherwise be available for direct services to program clients. KEYS needs to be open to more programs at the community college and not limited to AAS degrees (since most community college students require more than two years to complete associate degree requirements due to need for remediation and other factors). Include the same programs on the ETPL.

Response: The inclusion of KEYS in the WIOA Combined State plan will not alter the current fiscal or programmatic policies and procedures of the KEYS program. The LWDBs will not have any oversight of KEYS programs.

- Perkins Funding

Community colleges have served as the primary post-secondary provider of career and technical education in Pennsylvania and throughout the nation for many years. Funding from the Carl D. Perkins Career and Technical Education Act has been instrumental in assisting community colleges with the necessary resources to develop curriculum, acquire equipment to replicate industry applications, serve members of special populations to ensure that they succeed in career programs, and provide professional development opportunities to enable faculty to maintain current in changes in the workplace. Career and technical programs rely on industry-led advisory committees to assist in identifying emerging high priority occupations, maintain programs that meet employer needs, and leverage other resources to offset the high costs that often accompany programs in advanced technology.

In order to ensure that the Perkins grant funding continue to support education and training in an effective and timely manner, we make the following recommendations that relate to the State WIOA Plan:

- There is no benefit to combining Perkins with the State's Proposed WIOA plan. It would impose an additional and unnecessary bureaucratic burden on the colleges, in terms of increased reporting requirement. These additional requirements would reduce direct funding that would otherwise support students.
- Community colleges possess the knowledge and expertise to develop curriculum and course sequencing to best meet the needs of skill attainment and effective academic pathways to higher learning.
- By working closely with employers and other stakeholders, community colleges are well positioned to meet the goals of the Workforce Innovation and Opportunity Act.
- Community colleges should be considered as the first choice as an education and training provider for individuals seeking services through the CareerLinks. Private and for-profit training organizations charge significantly higher tuition and fees, placing a disproportionate burden on both the individuals seeking training as well as the LWDBs, whose limited funding is further reduced by allocating funds to high cost providers.

Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re-evaluate the fit between Perkins and WIOA as federal guidance becomes available. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the

Perkins plan is detrimental to the achievement of the Governor's goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to include Perkins as part of the WIOA state plan.

Kate Pursel, **Dillsburg Area Public Library** offered the following comment: I would like to take this opportunity to give my opinion on how the resources and expertise provided in public libraries could help to shape a stronger, more productive workforce which benefits all of us through a stronger Pennsylvania economy. I am currently a Library Director with many years of various jobs in various libraries including school, academic and public. I have personally used volunteering in a library as a springboard for my own career. Volunteering in libraries is a valuable community resource for students, seniors, parents re-entering the workforce, or the unemployed. I have seen many students working as a public library Page for their first job, gain valuable experience in responsibility, accountability and communicating with patrons and staff.

Public libraries are the primary source for many unemployed workers for computer use and assistance with applying for jobs online, creating resumes, and finding job postings. This help is always available, all hours that the library is open. Public libraries are also becoming a source for older students earning a degree online, who need help navigating online databases and beginning their research. With initial help they become proficient themselves, but continue to use the computers available at the library to earn their degree.

Entrepreneurs starting their business also rely on public libraries for computer use or WiFi, printing, copying and meeting room use. Many local businesses give presentations at public libraries to increase their awareness to the community.

For all of the above reasons, public libraries should have increased funding to ensure these valuable career resources continue to be available. Increased funding is needed to ensure that skilled, educated Librarians are being utilized, valued, and paid, plus staff that is paid competitively. Libraries should be funded and acknowledged for the increased value they can bring to the community, not asked to submit applications for special additional career programs, when just by being open these services can be available.

Response: We appreciate your comments on the library's support for the unemployed and for younger workers new to the process and your comments on the library's support for local businesses through technology and professional librarians. We note that the State Plan was revised to make further reference to libraries as system partners on pages 11, 42 and 48.

Mariann Kmetz, **Dimmick Memorial Library** commented: I am the Director of the Dimmick Memorial Library in Jim Thorpe. I am attending meetings in Lehighton with the Carbon Chamber and Economic Development Council, CCEDC. The committee I am listening in on is The Carbon County Business/Education Partnership. I am there to speak on behalf of the public library and to encourage the

school administrators (High School, Technical School, and the Community College) to use the library as a resource for their students. I am also hoping to find a way to provide career pathways for patrons who are no longer students and lack the necessary skills to secure employment.

The plan you shared sounds wonderful on paper. I would love to be able to offer our patrons seminars for job training, access to computers dedicated to job training, and programs to teach our patrons basic skills. I cannot fund my ideas. Dimmick Memorial Library is small. We are poorly funded. I do not have the resources to offer programs on my own. I would love the opportunity to become involved in the Workforce Development Plan.

Response: We appreciate your comments on how the library in a small community could better serve jobseekers and employers and note that the State Plan was revised to make further reference to libraries as system partners on pages 11, 42 and 48.

Disability Rights Network of Pennsylvania offered the following comments:

- Page 7: This section contains multiple references to the goal of “creating more jobs that pay”. Specifically with regard to Section IV of the plan and Vocational Rehabilitation Programs (OVR), DRN wishes to emphasize that OVR is much more than simply another “jobs program”. OVR is unique from other job training programs because it emphasizes counseling and guidance and individualized services needed by Pennsylvanian’s with disabilities who wish to pursue meaningful careers and live independently. Its focus is individualized services needed to prepare for, maintain, obtain or advance in employment that are consistent with the unique interests, capabilities, abilities, and informed choice of the individual.

Response: We appreciate the comment and agree that OVR offers a wide range of services to individuals with disabilities beyond simply job placement.

- Page 12: This section highlights the policy that the Commonwealth be an “Employment First” state. DRN agrees that Pennsylvania should be an Employment First state. However, the Commonwealth needs an Executive Order or some type of legislation to make this policy official. Currently there is no such policy, and in order for this policy to truly impact employment services for people with disabilities and others, it needs to be formalized.

Response: We appreciate the comment and agree that the Commonwealth should be an "Employment First" state. An Executive Order was issued by the Governor on March 10, 2016.

- Under “Identified Areas for Improvement” there is discussion of improving the CWDS system that collects participant data and performance outcomes. DRN suggests that the

CWDS system share data with the HCSIS (Home and Community Services Information System) utilized by the Department of Human Services. HCSIS should also share data with CWDS. This will ensure that people with disabilities can access employment services more quickly from Workforce Development partners. It will also allow for supports coordinators to have a better tracking mechanism for employment services. Finally, it will increase the amount of collaboration between the Department of Human Services, OVR, and other workforce development partners.

Response: The commonwealth must ensure the integrity and security of data among all partners and programs. As the volume and diversity of data grows, so too do the opportunities and challenges of sharing information among all involved. We are committed to expanding access within the parameters outlined by statutes, regulations, and policies that govern the release of this data.

- The last mentioned point is training of staff to ensure cross-program alignment. Training for staff must include training on obligations to provide reasonable accommodations to individuals with disabilities and how to ensure programmatic access for people with disabilities. Many people with disabilities feel that they are not adequately supported at Careerlink offices. Continually focusing on training topics around disability issues and the right to a reasonable accommodation, and sensitivity training will ensure that individuals with disabilities have full and equal access to Careerlinks.

Response: OVR offer business solutions consultation and training that promote best practices for Employee Workplace Accommodations, Accessibility Assessment and Disability Etiquette presentations as additional no-cost services to workforce partners, businesses and organizations across Pennsylvania.

- DRN supports the Memorandum of Understanding between ODP and OVR to increase employment supports and services for people with intellectual disabilities. Traditionally, people with significant intellectual disabilities have been underemployed or have worked in sheltered workshops. Allocating funding for OVR to work with individuals with intellectual disabilities will increase competitive community integrated work opportunities for young adults and adults.

Response: We appreciate the comment in support of the MOU.

- Section IV, Vocational Rehabilitation Programs, Input of State Rehabilitation Council, p. 110 – DRN supports increased OVR involvement in publicizing and making OVR customers aware of the opportunity to participate in Citizen Advisory Committees (CACs). The CACs are critical for OVR to find out about service delivery issues or other concerns from OVR customers and advocates. It is extremely difficult to find a centralized listing of CAC

meetings. DRN recommends that, at a minimum, OVR publicize CAC meetings on their website and send out notices on their listserv, and social media tools. OVR should also provide written information on upcoming CAC meetings to Centers for Independent Living across the state so that this information is readily available to CIL consumers.

Response: We appreciate the comment in support of this effort. OVR will continue to promote CAC meetings and the sharing of District Office CAC best practices that are effective and well attended by consumer customers.

- Section IV, Vocational Rehabilitation Programs, Input of State Rehabilitation Council, p. 111 – DRN also supports the Rehabilitation Council recommendation ensuring that all communication is accessible. We note one concern in the OVR response to the recommendation. The response outlines various accessible formats that will be provided. The language should also include, “or other accessible formats as needed to ensure effective communication as required under the Americans with Disabilities Act.”

Response: We appreciate the comment in support of this effort. OVR promotes the message of "Access Equals Success" in support of the PaRC's recommendation ensuring all communication is provided in accessible formats as needed and have added the suggested language to the state plan on page 110.

- Request for Waiver of Statewideness, p. 113 – DRN recommends that during the period of this plan, OVR develop additional interagency agreements across the state to mirror that already in place with Berks County. This would eliminate the need for waiver of the statewideness requirement.

Response: We are in agreement with the recommendation and appreciate the comment in support of expanding these efforts.

- Section IV, Vocational Rehabilitation Programs, Coordination with Education Officials, p. 117 – This section summarizes the OVR Transition Policy outlining when counselors can work with transition aged youth. The policy should provide a timeline for development of the Individualized Plan for Employment (IPE) so that it is developed prior to high school graduation for students. This will ensure that graduating students have necessary employment and/or training services and supports in place prior to graduation. DRN recommends that IPEs should be developed and signed by OVR and the customer at least 3 months prior to graduation. In addition, if OVR finds any youth to have such significant disabilities that OVR cannot immediately find the youth eligible and provide cost services, OVR must develop an IPE to provide community based work experiences, other necessary evaluations to determine ability to benefit from OVR services, and counseling and guidance. In the event that a youth is found ineligible based upon severity of disability, OVR is

reminded of its obligation provide that youth with information on his/her right to appeal the ineligibility determination, as well as his or her right to contact the Client Assistance Program or other representative of his or her choosing for assistance.

Under WIOA, OVR is reminded that it must re-evaluate that youth on at least a yearly basis. DRN recommends that information concerning its written policy and procedure for the re-evaluations be followed on a statewide basis, tracked, and made available on OVR's website and/or to the Pennsylvania Rehabilitation Council, DRN and the Client Assistance Program (CAP), on at least a quarterly basis. DRN recommends that youth who do not choose to apply for OVR services the first time they are approached be re-approached on at least a yearly basis. This information should also be tracked and shared as outlined in the previous comment.

Response: We appreciate the comments in support of the plan. OVR is aware of its legal obligations to provide pre-employment transition services to students with disabilities. Once final WIOA regulations have been issued, OVR will amend its Transition Policy to address timelines for working with students with disabilities while in school and the development of their IPE. OVR has expanded its service definitions to include "Pre-Employment Transition Services" that will help direct individuals with disabilities who are still in high school into more competitive, integrated forms of employment. We appreciate the comment and note that under WIOA a young person will not be referred to a sheltered workshop without having the opportunity to access career counseling and employment services first. As required, OVR will track and report information pertaining to Section 511 implementation as outlined in the final regulations.

- Coordination with Education Officials, p.118 – There is a list of things that OVR staff must do as it relates to getting information to school age youth. This list should include the family training on options following high school, including employment alternatives to sheltered workshops.

Response: We appreciate the comment and recommendations for OVR's continued commitment and focus on transition serving students and youth with disabilities. OVR developed the Early Reach Program that puts Early Reach Coordinators out in schools and at community events talking about OVR services and how we can assist with transition.

- Cooperative Agreements with Private Nonprofit Organizations, p. 119 – DRN recommends that all cooperative agreements with private, nonprofit organizations be available to the public. These, along with all active OVR policy memos should be posted to the OVR website and updated regularly.

Response: We appreciate the comment and support effective communication and transparency.

- Arrangements and Cooperative Agreements for the Provision of Supported Employment Services, p. 119-120 – This states that OVR will coordinate with DHS program offices regarding supported and extended employment services. The proposed Consolidated and P/FDS waiver amendment states that waiver participants must be referred to OVR prior to receiving these services unless 1. Person is already competitively employed and needs extended supports; 2. The person is using supported employment vocational skill development purposes; 3. The person has an ineligibility determination from OVR; or 4. OVR has previously closed the waiver participant's case. DRN recommends that OVR develop and implement time frames for referrals of not more than 30 days to ensure that potential OVR customers are not waiting for extended periods of time between referral to OVR and eligibility determination.

Response: We appreciate the comment that promotes continued collaboration and partnership between OVR and DHS Office of Developmental Programs (ODP). OVR continues to work collaboratively with ODP to identify and reduce barriers to employment for people with intellectual disabilities. OVR is implementing an Interagency Agreement with ODP that will provide for a jointly funded initiative to create additional VRC positions and additional funds for services for individuals with intellectual disabilities. Provider Transformation training will be taking place in spring 2016, facilitated by the Governor's Cabinet and Advisory Committee for People with Disabilities, and through the efforts of subject matter experts to help providers understand the implications of Section 511 of WIOA and the CMS final rule.

- New Vocational Rehabilitation Counselors, p. 126 – DRN recommends that OVR analyze the number of counselors necessary to provide meaningful vocational rehabilitation services on a statewide basis, particularly in light of the new WIOA requirements.

Response: We appreciate the comment in support of ensuring adequate number of OVR counselors to provide VR services.

- Personnel to address communication needs, p. 128 – DRN recommends that OVR review the manner in which it assigns OVR counselors to improve effective communication between the counselor and the OVR customer. For example, a RCD may not be the best assignment for an individual who is hard of hearing, but not deaf. Further, all OVR customers should be advised of the right to request a counselor change.

Response: We appreciate the comment. OVR promotes effective communication between counselor and the OVR customer throughout the VR process. Case transfer to a different counselor can be accommodated as situations warrant.

- Special Populations, p. 129 – DRN recommends that the “Transition Resource Manual” identified here be made available to other organizations and OVR customers. A link to the manual should be readily available on the OVR website. OVR counselors should be required to attend a percentage of local transition council meetings throughout the year.

Response: We appreciate the comment and recommendation. OVR makes resource materials available on the agency's publications page on the website. OVR counselors strive to attend local transition council meetings when possible and as their schedules permit.

- Section IV, Vocational Rehabilitation Programs, Comprehensive Statewide Needs Assessment, p. 133 – The Comprehensive Statewide Needs Assessment is going to collect data regarding Hiram G. Andrews Center and the effectiveness of the HGAC programs. DRN suggests that instead of evaluating the effectiveness of the programming at HGAC, OVR spend money developing additional Transition Programs at colleges across the commonwealth. These programs could provide similar experiences and training opportunities to those at HGAC, but would be provided in an integrated, community based setting as opposed to the segregated campus.

Response: We appreciate the comment and support the importance of evaluating HGAC programs and services. OVR is supporting the development of Comprehensive Transition Programs (CTPs) in Pennsylvania through the ACES Grant which was awarded to the DREAM Partnership. Currently, four institutions of post-secondary education are receiving funding to develop and implement CTPs on their campus: Millersville University; Mercyhurst University; Slippery Rock University; and Arcadia University.

- Order of Selection, p. 136 – It is recommended that OVR review its order of selection definitions to determine if all individuals with the most significant disabilities are being served. The list of functional capacities should be reviewed. It is recommended that OVR track and re-contact those individuals who are found ineligible for OVR services during the fiscal year. Tracking this data should help OVR to identify barriers to service delivery.

Response: OVR will maintain its current Order of Selection of serving eligible individuals with most significant disability (MSD). Throughout the year OVR senior management will evaluate and monitor the agency's available resources on a regular basis to justify the priority category within the order. Per federal regulations, OVR currently tracks and re-contacts individuals who are found ineligible for OVR services. All individuals who have had their cases closed in Statuses 08, 28, or 30 due to ineligibility will have a review of the ineligibility decision within one year of the determination when the ineligibility decision was based on medical factors; or, on the inability to achieve a vocational goal. The purpose of the review is to reevaluate the determination of ineligibility, considering new information and changes in the individual's condition which may have an impact upon his/her potential

to achieve a vocational goal. The review process is also a means to determine whether or not the individual wants to have the ineligibility decision reconsidered and this process will allow full consultation with the individual. When closure is from Status 02 to Status 08, one review must be done within 12 months of the ineligibility determination.

- Section IV, Vocational Rehabilitation Programs, State Strategies, p. 143 – Family education regarding the changes in placements to sheltered workshops is critical in ensuring that the intent of Section 511 is followed. DRN is supportive of family training and education opportunities and suggests that OVR partner with the Department of Human Services and Department of Education on a training strategy. Family and OVR customer education must include counseling and guidance concerning employment alternatives to sheltered work.

Response: We appreciate the comment in support of collaboration and partnership between OVR, DHS and PDE. PDE is pleased to work with DHS on developing a training strategy for school based IEP teams related to secondary and postsecondary work and educational opportunities.

- Pre-employment transition services, page 146 – OVR should include travel training in its list of expanded services for transition age youth. Travel training should not be limited to individuals who are low vision or blind and need orientation and mobility training. The ability to get to and from work safely is essential to successful employment, regardless of the disability.

Response: We appreciate the comment in support of the plan. OVR agrees that travel training should not be limited to individuals who are low vision or blind and the ability to get to and from work safely is essential to successful employment. Travel training will be made available to OVR customers as outlined on their IPE.

Susan Lyons, **Eastern Monroe Public Library** commented: Public libraries are free educational institutions that serve everyone in the community without barriers, prerequisites, or red tape. We are key players in training Pennsylvanians in basic job skills and assisting those who are seeking employment. I would like to see the Workforce Innovation report cover the role of public libraries in greater detail and also recommend greater support for the workforce development role of libraries, especially under Goal 2.

At my library we offer weekly computer classes on topics such as: Introduction to computers and the Internet (2 classes – basic and advanced); Microsoft Word; Microsoft Excel; Resume preparation; Setting-up and using email; Tips for using smartphones, tablets, and laptops.

These classes are small (six people – the number of laptops we could afford) and give our patrons hands-on experience in a safe, low-stress environment. Librarians teach the classes and the student-teacher ratio is 3:1. We began with a 6:1 ratio but found that a back-up teacher was needed given the mixed

experience levels of our students. We follow-up the introductory classes by showing patrons additional training resources available through library databases and reliable online sources.

Beyond the weekly classes, libraries assist patrons daily in using the Internet to apply for jobs. Like all public libraries, we provide free computer stations with Internet access and free Wi-Fi throughout the building. Free computer and Internet access is critical in finding employment for many of our patrons.

Most large retail employers (e.g., Wal-Mart, Target, Home Depot, Lowes) now require job applicants to apply for open positions online. In so doing, employers have effectively made basic computer literacy a job requirement for entry-level positions. In assisting patrons with these online employment applications, we try hard to give patrons the skills necessary to do it independently. This often entails helping the patron set up an email account and understand how to use it. They must also understand: how to use flash drives to save documents; how to create cover letters and resumes; how to use the spelling and grammar check features; and how to search the Internet effectively to find employment opportunities.

This is time-consuming work but I think most public libraries would like to do more of it if we had sufficient resources to do so. Public libraries would welcome greater support from the Commonwealth in expanding our workforce development efforts.

Response: We appreciate the comments about libraries that offer computer training, meeting spaces for training and the value of statewide purchase of electronic resources for jobseekers. We note that the State Plan was revised to make further reference to libraries as system partners on pages 11, 42 and 48.

Mary Rennie, **Erie County Public Library** offered the following comment: We at the Erie County Public Library wholeheartedly welcome the release of Governor Wolf's Strategic Vision for Workforce Development in the Commonwealth of Pennsylvania.

It is a strategy that is informed, straightforward, and realistic, in terms of analyzing the current workforce problems and challenges that face the Commonwealth, as well as identifying action steps for addressing these issues.

Public Libraries are clearly aligned with the Governor's Strategies. In particular, Goal 1: Establish Career Pathways is a natural role for libraries. While the development of resources and tools will be important in accomplishing this goal, the more critical component will be the development of a successful, outcomes-based method of facilitation that connects people to them. This is where our existing statewide public library network—several hundred strong— connected by Commonwealth Libraries under the Pennsylvania Department of Education, will be key.

- Strategically located throughout the Commonwealth, public libraries are well established and, for the most part, do not require capital startup funding or the creation of new infrastructure.
- Libraries are welcoming and accessible—many of them open 7 days each week, and for multiple shifts. Simply put, we reach people. Visits to Pennsylvania libraries number in the vicinity of 50 million annually. There is no other existing institution that attracts this type of willing, expansive, and devoted participation.
- According to the latest Pew studies, libraries connect broadly to every demographic—covering age, race, gender, ethnicity, education, socio-economic status and income. This includes those residents identified as a clear priority in the Governor’s plans—those “with substantial barriers to employment.”
- Libraries are one of the oldest institutions in the history of humanity. As such, we are recognized “neutral” environments, and a welcome antidote to the “silos” identified as one of the main challenges within the Governor’s Plan. The Commonwealth needs this sort of ‘cultural glue’ within each community, which is demonstrably able to unify existing providers and entities without being seen as a competitor.
- The Strategy calls for public/private partnerships. With diverse streams of revenue already in place, libraries themselves ARE public/private partnerships. Additionally, the local leaders, who comprise our various Boards, provide the connections and linkages to other support structures located within each library’s individual community.
- Libraries already work closely and constructively with others on the local level. For us, collaboration is not a buzzword, but a service standard. At the Erie County Public Library alone, we partner actively with dozens of other leading individuals, institutions, agencies, and businesses.

ideaLAB

The Erie County Public Library (ECPL) is in the final stages of architectural plans for our ideaLAB – a space dedicated to fostering community partnerships, innovative programming, motivation, inspiration, culture building, combined with the availability of state of the art facilities, technology and equipment that will connect people with experiential learning opportunities that will enrich lives and strengthen our community.

The ideaLAB will have direct impact on helping the Commonwealth meet the first workforce development goal of establishing career pathways. We have found that while our region may have tools available to help people reach self-sufficiency, the beginning steps of their journey are often the most daunting. The Library serves as a natural “on ramp” as it is already a non-threatening, trusted community institution with a long history of helping people.

The ideaLAB will provide a physical space in the Blasco Memorial Library with a dedicated staff focused on guiding patrons through the steps they can take to achieve their personal goals. Patrons will have the opportunity for facilitated direction which will focus on a basic skill inventory and creation of a schedule of library classes that fill any deficiencies.

Community partnerships will be a crucial part of the success of this program. The next step will be to create a bridge to the community resources that can move the patron toward their goal. The library is currently collaborating with many local businesses and organizations that also have a mission of giving the community opportunities. While we are not interested in duplicating services, it is essential that we guide our patrons to local resources as well as collaborate with existing organizations to provide instruction to our patrons at the library. In this vein, the ECPL, and libraries across Pennsylvania, actively work to support access that is “enhanced through the use of technology and creative partnerships with community organizations and other service providers (WIOA, pg. 7).”

Libraries are a natural first step on an individual’s career pathway and are already a trusted institution giving the opportunity to truly impact those most in need in our community. Libraries are perfectly positioned to provide widespread impact with locations across the state in key locations. The library serves as a natural lifeline to community resources, structuring ourselves around our missions, and through providing inspiration and motivation for all who cross either our physical or virtual thresholds build up the cultural capacity of our community.

The library is where the 60% of households in Erie who do not have reliable internet at home are found using our public computers to apply for jobs, create resumes, apply for social services, take online classes, and search for information. In our libraries, as is the case nationwide, we find that a large number of individuals do not have the soft skills they need to complete these online applications and forms necessary to move them toward self-sufficiency.

In the past, a staff member would guide these patrons to take a basic computer class at the library, or to meet with a staff member for resume help, but these initial steps do not solve the issues at hand. Therefore, we are currently developing a model that will help us lead our patrons through all the steps they’ll need to succeed with the ability to study their outcomes.

To do so, we are developing a navigation service of following the patron from library to community resources to employment, working closely with them. We are very interested in the standardized WDQI reporting tool for measuring outcomes. A consistent measuring tool across the state could give us the professional reporting we need to show our community impact.

As we work to develop a facilitated program, we are also greatly increasing our classes and programs with needs impact in mind. A sample of several on-going programs at ECPL illustrates how programmatic partnerships with public libraries support Goal 1.4 of the WIOA draft plan, and are beginning to lay the foundation to directly support outcomes anticipated with Goals 2.5, 2.6, and 3.4. :

- Entrepreneurship Series
 - Ice House – helping the community develop an entrepreneurial mindset. (community partner – Innovation Collaborative)
 - IdeaShare – a meet up for people with ideas about new products, inventions, and businesses, facilitated by an established local entrepreneur
 - How to Start a Small Business 101 (community partner – SCORE) – Learn the basics about what it takes to start your first business

- Employment Series
 - Ace the Interview (community partner - Erie Insurance) – learn job interview skills from an HR professional
 - Understanding LinkedIn
 - Beginning Resumes
 - So you want to be a... (variety of community partners) – Learn about unique professions from local experts
- Tech Skills Series
 - Adult Coding Camp
 - Teen Coding Camp
 - Basics of the Cloud
 - Computer Classes, which include everything from Basic Computing, the basics of email and social media, to advanced software programs.
- Additional Core Skills
 - Universal Class – online continuing education
 - BenchPrep – online career prep classes/resources
- Workforce Development
 - Summer JAM –paid apprenticeship and internship program for economically disadvantaged school age youth (through age 19)
 - Provide summer employment with multiple employers across Erie County, including the County of Erie and the ECPL

The Erie County Public Library is embracing the rapidly changing face of libraries and meeting our community's needs head-on. We truly believe that the "future does not belong to the faint-hearted, it belongs to the brave." The opportunity presented for libraries to engage as a full partner are vast, and it is essential that libraries are viewed as a vital partner in moving Pennsylvania forward.

Thank you for this opportunity to share our contributions and partnerships on a larger scale and we look forward to next stages of this plan.

Response: We appreciate your comments on the plans substance and clarity, the supporting roles that libraries could play and the articulation of the library's unique assets. We also appreciate the comments on IDEALab and the bringing together of local partnerships as well as the role the library plays in experience-based learning and serving as a starting point on career pathways, career preparation particularly for underserved citizens, and outlining the library's classes and programs that support improvement in workforce skills. We note that the State Plan was revised to make further reference to libraries as system partners on pages 11, 42 and 48.

George Currie, **Erie Press Systems** offered the following comments:

- Training Benchmarks: In general, it is concerning that the state's plan does not define training when talking about benchmarks. Title 1 dollars are currently utilized in the system to support many things including industry partnerships and employer services such as targeted job fairs. If the benchmarks are increased for training, I hope the definition would include things that are important to manufacturers such as apprenticeships and on the job training. In addition, it is the hope of manufacturer's that the training that is occurring with funding would benefit employers

by providing the skills that are needed in the local area and/or commonwealth. Given the prominence assigned to working with and through Industry Partnerships as indicated throughout the state plan, we are concerned that building and expanding these partnerships provides no funding for IPs in NWPA as part of the 2015/2016 PA state budget. The lack of funding for IPs and the requirement that more Title 1 dollars to go for training will directly impact services of the PA CareerLink(R) offices.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- Priority of Service Benchmark of 70%: This benchmark is unlikely to provide employees that have the necessary skills to work in my manufacturing environment except at the lowest levels of the organization and at the lowest wage level. This benchmark will not help me fill the skills void that exists in my manufacturing business and our manufacturing area. It would be beneficial to the local Workforce Development Board to have the flexibility to meet the needs of the job candidates and employers rather than set an arbitrary benchmark for the entire Commonwealth.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- Employer Services (p. 24 and throughout the plan): There is little discussion how this plan meets the needs of employers. In general, the plan does not cover many employer services. The focus is on funding which follows job candidates. The plan targets (70%) to candidates with barriers to employment and prioritizes three areas 1) recipients of public assistance 2) other low income individuals and 3) individuals who are basic skills deficient. There is some discussion about Industry Partnerships, but with the training benchmarks being proposed limited funding to support them. More concerning is the mention of high quality jobs with no definition provided. Is there a plan to provide priority of service to employers that pay high wages? How will this be determined? What happens to entry level jobs? Will employers be penalized for these positions These are the very positions that may benefit those with high barriers to employment.

Response: We appreciate the comment and recognize some subjectiveness in the term "high-quality jobs," although the plan outlines characteristics of high quality jobs (reasonable wages, benefits, full-time stable employment, advancement opportunities, etc.) in the introductory language under Goal 4. While the State Plan emphasizes and encourages high-quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high-quality jobs. We also agree with the commenter that the workforce development system can only be successful if it is responsive to the needs of employers. Goal 2 focuses on developing

a pipeline of workers to meet industry needs and Goal 4 speaks to engaging employers and being responsive to their needs.

Stephen Marvin, **FH Green Library, West Chester University** offered the following comment: I have worked with libraries for over 40 years many involved with direct programs to improve the business climate.

In the Ridley Township Public Library I was hired to serve as the business librarian under a grant. As part of the duties, I produced a newsletter on new business titles, answered business reference questions, attended local area business meetings and attended state wide presentation on service to business with 3 workshops across the Commonwealth in Oil City, Penn State and Chester County Library.

Upon expiration of the LSTA grant at the Ridley Township Public Library, I became the Business and Government librarian at the Chester County Library. While there, I hosted the business tent for the Chester County Tri-centennial and an annual Salute to Small Business in Chester County. I continued to attend Chamber of Commerce meetings and provided early access via a grant to online databases with Dialog.

Then moved to the academic world and became the fee-based Executive Library Services (Exels) at Drexel University Hagerty Library. (http://www.tandfonline.com/doi/abs/10.1300/J120v09n22_12). The service was abruptly closed under a new library administration. But the foray made in the business community was very impressive. The recognition included the Delaware Valley Industrial Relations Center and grants from the Commonwealth and the U.S. Defense Intelligence Agency. ExeLS became a NASA Application Center with networks to NERAC in Connecticut and SERAC in Gainesville, Florida. At this point I became more involved with work force development projects.

Then became Director of the Dr. Michael Margolies Coatesville Area Public Library attending weekly Rotary meetings and advancing the community with acquisition of a satellite dish from the Commonwealth.

After a stint with many corporate services, I became business subject specialist with the Dialog Corporation. Worked with the Work Force team of the DVIRC.

Currently serving in capacity in the academic world again at West Chester University. Appointed by Hon. E. Z. Taylor as a representative to the Team PA Foundation started by Governor Ridge. TeamPA encouraged to have meetings while attending conferences or other business meetings in different areas of the country. I was able to meet Qualcomm in San Diego and AIP in Beijing China. As time permitted I have been active with the PaLA Association with government information services and electronic access to resources. All of this note is to convey the importance of library services to business and in support of the labor force. Unfortunately, Public libraries tend to be suspect by business groups who feel the library is part of the government administration. On the opposite hand, many companies feel wrong to utilized academic information services from libraries as they are not part of the licensed authorized user communities. Other companies embrace library representation in their professional associations such as the Chamber of Commerce and Rotary.

Since my earliest recollection living in a very small town of 800 people, in high school I would take the bus to the library in Syracuse and borrow material and do research. Then at the end of the day, take the only city bus back home to my town and walk about a mile to get home. It was always and will be the

realization that the library card is the first step with civic engagement with the community on a personal and intimate level.

Thank you for seeking input into your anticipated plans to enhance services to the business community. I hope this small testament will benefit an inclusive plan of action recognizing some of the inherent restraints the work force may have for using academic or public libraries.

Response: We appreciate your comments about the importance of library services that support business and the development of a more highly skilled workforce and note that we made further reference to libraries as system partners on pages 11, 42 and 48 of the final State Plan.

Karen Kenderdine, **FNB Wealth Management Trust Group** offered the following comments:

- **Training Expenditures:** While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- **Priority of Service Benchmarks:** Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- PA CareerLink® – Online Services as an Enhancement: PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self-service options both inside and outside of PA CareerLinks® is of value in today’s increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face-to-face career coaching and mentoring as well as the many other hands-on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

Nathaniel Eddy, **Free Library of Philadelphia** commented: The Free Library of Philadelphia is looking to develop and launch innovative initiatives around workforce development that support entry level and low skilled jobseekers as well as special populations such as young adults with autism. We have a strong track record in providing traditional library programming targeted to jobseekers – resume assistance, job searching, interview techniques – and serve a population in great need of these direct services. A 2012 Pew report found that 29% of Free Library users come to the library to look for jobs and often, these individuals are low skilled and live in communities with high rates of poverty. Highlighted below are two initiatives - one proposed and one currently underway – that we feel demonstrate ways in which libraries can leverage already existing support structures and at the same time, develop more robust and innovative service models that foster greater opportunities for our diverse community of job seeking individuals.

With funding support made possible through consideration in PA’s Consolidated Workforce Development Plan, The Free Library will be able to launch the initial phase of the Job Readiness Training Initiative and grow and continue the work already accomplished in our Library Workplace Experience for Young Adults with Autism.

Free Library Job Readiness Training Initiative

Since the 1970’s, the Free Library at Parkway Central has been the hub of services offered to jobseekers, first through the Lifelong Learning Center, and now at the WORKPLACE, which opened in 1988. Our neighborhood and regional libraries have also provided continuous support to this group of users through access to computers, one-on-one assistance, workshops on topics such as resume building, interview skills, and cover letters, host to numerous job fairs, as well as through material support and database subscriptions. Most recently, in May 2015, the Free Library created a new job class, the Digital Resource Specialist, to assist patrons in digital literacy skill building, much of which falls to the jobseeking category. This work, however, has never had a direct impact on the employability of our users. While the library has traditionally been extremely active in assisting individuals to find and apply for work, we do very little as an organization to provide a pathway to employment. And although we highlight our efforts in workforce development as having contributed to “1000 jobs found” as reported

in a 2010 Fels Institute of Government study, there is little hard evidence that supports this number. The Job Readiness Training Initiative seeks to bridge this chasm.

In considering educational attainment requirements, entry level wages, regional hiring trends, and estimated openings, a job skills training program targeted to customer service and/or customer facing positions that require exceptional “soft skills” is proposed. This aligns with regional reporting that find just under 24% of Philadelphians hold a Bachelor’s degree and further demonstrates the needs of Free Library patrons with low skill sets and limited workforce experience.

To launch an initial pilot, local employers will be identified and recruited to the initiative with an agreement to provide face to face interviews with successful graduates of the training program. In return, the Free Library will work to ensure all candidates meet employer job expectations and requirements of which, in addition to skills training, may include certifications, criminal background checks, and drug and child abuse clearances, among others.

Candidates to the skills training initiative will be recruited through various channels such as advertising via our libraries, Free Library website postings, and email lists and is open to any Philadelphia resident with a valid library card. Course length and structure will be determined based on industry sector and employer need, however, should run no more than 6-8 weeks. Below are two sample training modules:

- Customer Service skills Training: two week course designed to equip graduates for positions in retail sales and public facing positions. Open for 12 individuals
- Professional Culinary Skills Training: in partnership with Community College of Philadelphia, curriculum includes the history of the industries, current problems and trends, business operations, fundamental cooking methods, proper kitchen and sanitation standards, food preparation and knife handling. Program graduates receive nationally recognized ServSafe Food Protection Manager Certification.

Library Workplace Experience for Young Adults with Autism

The Free Library is currently piloting a Workplace Experience for Young Adults with Autism at two Neighborhood Library locations. Working with MaST Community Charter School and SPIN, a Philadelphia based non-profit human service organization dedicated to providing quality services for children and adults with and without disabilities and their families in the community, the objectives of the pilot are threefold: to provide an internship opportunity for young adults with autism that allows them to gain valuable work experience; to develop an innovative model and alternative career path for individuals seeking career opportunities with the Free Library; and to further advance the Library’s ongoing effort to become a more welcoming and inclusive environment to individuals with autism.

Through extensive research, communication, and work with various autism affiliated organizations here in Philadelphia, the library has learned the network of support services that exist for families and their children diagnosed with autism spectrum disorder drastically reduce once an individual enters into adulthood. The Free Library, in its effort piloting this initiative, seeks to provide greater job opportunities for those transitioning into adulthood and to be the first City agency to create a workplace experience for young adults with autism.

Currently, four students from MaST Community Charter School have been identified and on-boarded through a 12 week, work-based learning course taught during Fall 2015 and led by certified staff members from SPIN. In February 2016, students will be placed in Neighborhood Libraries to begin their work based learning experiences and will be on site one day per week, four hours per day. Job coaches provided by SPIN will also accompany students to ease transition and will help facilitate orientation and develop socialization skills. Following completion of the assignments in June 2016, all students will be formally recognized for their contributions and have the opportunity to meet with representatives from the Library's Human Resources Department to learn how to find and apply for jobs through the Civil Service process. Continuation of the program is currently under consideration for Fall 2016 and will demand additional financial resources to launch and grow.

Response: We appreciate your comments about your library's engagement in workforce development through support of individuals, especially entry-level and low-skilled workers and those from special populations. We also appreciate your further comments about the library's job readiness training initiative and the sample training modules, and the library's internship program that provides work experience for young adults with autism. We note that we made further reference to libraries as system partners on pages 11, 42 and 48 of the final State Plan.

The **Fulton County Commissioners** offered the following comments:

- **Training Expenditures:** Many of our residents are not interested in pursuing additional training; they simply want to rejoin the workforce. While there is certainly value to upskilling the Commonwealth's workforce by increasing the number of individuals earning college degrees and industry recognized credentials, the workforce system encompasses much more than training. A careful review of the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title I funds to training will negatively impact the delivery of valuable career and business services in our region. We anticipate reductions in program staff, including career planners and business services specialists, as well as the downsizing or closure of some PA CareerLinks® in the Southern Alleghenies. The establishment of benchmarks based on a percentage of the local workforce area's federal allocations negates the many other valuable services the local workforce system provides to employers and job seekers. Each year, the Southern Alleghenies Workforce Development Board allocates some 20% of its Title I funding and 100% of its Rapid Response dollars in support of retraining, and each year a portion of these funds go unspent.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- **PA CareerLink® – Online Services as an Enhancement:** PA CareerLink® centers serve as the storefront and face of and for the delivery of services to businesses and job seekers in the commonwealth. While increasing the quantity and quality of online, self-service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society, the reality is that many of the hardest to serve customers do not have strong technology skills or

access to computers or the internet. Furthermore, considerable portions of our region are not serviced by high speed internet. Online services cannot replace face-to-face career coaching and mentoring as well as the many other hands-on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

The **Georgetown Center on Poverty and Inequality** submitted the following comments: Thank you for the opportunity to comment on the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan for fiscal years 2016 through 2020. The Georgetown Center on Poverty and Inequality (GCPI) strongly supports the comments submitted by Community Legal Services (CLS) and the Community Justice Project (CJP) outlining the importance of allocating the full share of funding under WIOA that may be dedicated to transitional employment, a form of subsidized employment that focuses on transitioning workers into unsubsidized employment.

GCPI works with policymakers, researchers, practitioners, and advocates to develop effective policies and practices that alleviate poverty and inequality in the United States. The center's areas of anti-poverty work include national, state, and local policy and program recommendations that help marginalized girls, promote effective workforce and education policies and programs for disconnected youth, and develop ideas to combat deep poverty. The center is in the midst of finalizing and publishing what may be the most extensive review to date in the space of subsidized employment and paid work experience programs (with a significant focus on transitional employment initiatives). The review, which includes a framework and recommendations for next steps in using these tools for helping workers—including youth—with serious or multiple barriers to employment, will be a valuable and lasting resource for policymakers and practitioners alike. Key findings from this forthcoming review, briefly outlined below, support this recommendation to use the full amount of funding designated for transitional jobs.

Overview

Under WIOA, states may spend up to 10 percent of Title I funds on providing transitional jobs opportunities, particularly for individuals who qualify for priority of service. Using the full amount of funding designated for transitional jobs in the state plan offers the Wolf Administration an opportunity to provide access to a promising strategy for boosting incomes and improving labor market outcomes and well-being, especially for disadvantaged workers.

Subsidized employment is a proven, promising, and yet underutilized tool for lifting up disadvantaged workers—particularly those in or at risk of poverty or with serious and/or multiple barriers to employment. Pennsylvania's proposed plan would give priority of service to such disadvantaged populations, including young adults who are not in school or working, individuals with disabilities, recipients of income supports, and people with criminal justice system involvement. These job programs

can provide income support, an opportunity to engage in productive activities, and, in some cases, labor market advancement opportunities. They can also offer a platform for connecting people to other needed services, resources, and networks. In addition to promoting work among adults struggling in the labor market, subsidized employment programs can also help strengthen disadvantaged families.

Key Findings and Recommendations for Subsidized Employment

Forty years of experience suggests that subsidized employment programs warrant significantly greater attention from policymakers and practitioners. Despite their track record and promise, available funding for subsidized employment programs is meager when compared to the potential efficacy of and need for these programs. There is also evidence in the history of demand for these programs: the number of disadvantaged people willing to work has consistently exceeded the number in competitive employment. The significant voluntary participation in sizeable subsidized jobs programs over the past 40 years underscores the fact that, regardless of wider economic circumstances, the labor market leaves out large numbers of disadvantaged workers desiring employment. Therefore, the center joins CLS and CJP in calling for Pennsylvania to use the full amount of funding—10 percent—designated for transitional jobs. Below are some key findings and recommendations from the center’s forthcoming report on subsidized employment that may be helpful/provide information in support of the proposed WIOA State Plan:

1. Subsidized employment programs have a wide range of potential benefits for Pennsylvania workers. First, these programs provide an important source of income to participating workers. Second, a number of experimentally-evaluated subsidized employment programs have successfully raised earnings and employment, with some programs providing lasting labor market impacts. This includes programs that have successfully been implemented in Pennsylvania, such as the Center for Employment Opportunities (CEO), which provides transitional work experience opportunities, including on-the-job training (OJT), to individuals with recent criminal convictions, and has recently opened a site in Philadelphia. CEO in New York City has been shown to reduce recidivism.
2. Subsidized employment programs can be socially cost-effective. In addition, subsidized employment programs with longer-lasting interventions and/or complementary supports may be particularly likely to improve employment and earnings. This pattern of high rates of effectiveness for programs with typical interventions lasting longer than 14 weeks—among rigorously evaluated programs—suggests that the role of benefit duration merits experimental evaluation. However, no research to date has isolated the impact of benefit duration within a subsidized employment program. Strong employer engagement, the provision of wraparound services, longer-term post-placement retention services, and other features of effective programs also appear promising as key ingredients and merit further examination. Other program design elements that may warrant additional experimentation include pre-training, program entry screening processes, job preparation services, matching processes, and peer support mechanisms.
3. The GCPI forthcoming report found that subsidized employment programs require further innovation to more effectively target specific population subgroups. This may be relevant for the Wolf Administration, as part of the Pennsylvania plan gives priority service to several subgroups,

including individuals with disabilities. Specifically, the report finds that subsidized employment helps people with intellectual disabilities gain independence and earning power—and yet, the broader spectrum of disabilities remains understudied. Some unsubsidized employment models, like IPS (Individual Placement and Services) have been proven effective, and offer templates for subsidized employment initiatives as well. In addition, many efforts that have targeted youth and young adults have seen modest success with education and criminal justice outcomes, but have resulted in limited or no durable improvements in employment and earnings. Note that for the youth-focused part of the State Plan, this is a particular area in need of innovation.

4. For Pennsylvania workers who likely can eventually succeed in the competitive labor market, subsidized employment should offer meaningful career ladders, a chance to develop skills through educational and training opportunities, and the possibility for advancement through increased responsibility and compensation over time. Also included in GCPI's forthcoming report is the recommendation to develop subsidized employment be in parallel with education and training initiatives that forge meaningful and sustainable connections between participants and the labor market. The center therefore strongly supports the Administration's commitment to ensuring that work-based training opportunities be "aligned with the Pennsylvania High Priority Occupation list to ensure that jobs are in-demand, have higher skill needs and are likely to result in family-sustaining wages," or, "in cases of individuals with significant barriers to employment, the commonwealth will support OJT, customized training and transitional jobs in quality entry-level positions that provide the work experience necessary to lead to employment in HPOs." As a result, multiple paths (as well as multiple entry and exit points within each path) with the ability to tailor specific programs and supports to particular participants should also be considered.

Conclusion

By increasing employment opportunities for disadvantaged workers, subsidized employment programs can be effective tools for the Commonwealth to combat poverty, persistent unemployment, and other undesirable social outcomes. The center commends the Wolf Administration's inclusion of proposed funding between 5-10 percent for transitional employment in the WIOA State Plan. As a result, in conjunction with the findings of the center's forthcoming report on subsidized employment and the recommendations of CLS and CJP, GCPI strongly supports the use of the full amount of funding designated for transitional employment.

Response: We appreciate your comments in support of our emphasis on transitional employment opportunities.

Dean Girton, **Girton Manufacturing Company, Inc.** offered the following comments:

Thank you for this chance to comment on the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan for the period July 1, 2016 through June 30, 2020. Local input will help to refine this plan to meet the needs of all sectors of the Commonwealth. I have personally been involved in the state's workforce programs since the inception of WIA. Serving on the Central Workforce Board from the start, first as Vice-chair and then as Chair. I also served two terms in two administrations on the State Workforce Board. During this time I have seen many good changes in the workforce programs training our future and current employees. As an employer, we have benefited from the services of the CareerLink system and other connected services. They have help our company of 85 highly trained

employees to compete in a very competitive international market for high-end cleaning systems for the pharmaceutical and food processing industries. The new WIOA law should enhance the effort even further. The requirements in this act promote local control because of the knowledge of local needs of the system. Thus, I am sure the state wants to implement this directive.

With this in mind, I would like to point out several concerns I have with the proposed state plan (pages 10 and 67) and suggest recommendations:

- An arbitrary rule of a flat 50% expenditure requirement for all WIOA Title I funds to be used for limited defined training does not consider local conditions.
- Training occurs in the PA CareerLink® offices by subcontractor personnel that is critical to getting a future employee of mine the necessary soft skills to be able to get and hold a job here. This training is not supported financially by the new state plan.
- The requirement for ITAs and OJTs to Priority of Service clients to be 70% of the cohort will drastically restrict the number of future employees trained as there are few clients of the system that meet the criteria. Today we are having trouble finding potential employees because of the lack of basic soft skills.
- I am not speaking as a member of the local Workforce board when I point out that you would be taking more than one thousand potential employees out of training by the Priority of Service requirement. This will improve the chances for my Italian and Canadian competitors to employee a skilled workforce supported by their countries and deny our Columbia County citizens a job.

I respectfully offer the following suggestions:

1. Foremost, define training in a broad sense as to not restrict it to ITAs and OJTs but to include the soft skills and other basic skills training provided by personnel at the PA CareerLink.
2. Recommend training targets to be set by local boards in cooperation with county commissioners that align with the plan's goals but also account for local conditions.
3. Change the Priority of Service target to a more realistic recommendation as not to create an entitlement program for job seekers at the expense of local businesses.

Thank you for allowing this input and giving consideration to my recommendations. I look forward to receiving a response to my suggestions.

Response: We appreciate the comments and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets. We do not believe the State Plan in any way limits training to only ITA and OJT. The commonwealth will be issuing guidance in the near future to include a definition of training, which will include multiple types of training beyond ITAs and OJTs. We will re-evaluate the priority of service target periodically to ensure that it is consistent with the Governor's overall workforce development strategy.

Kevin O'Donnell, **Greater Hazleton CAN-DO, Inc.** offered the following comments:

- **Training Expenditures:** While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title I funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well as job seekers that contribute to the regional economy.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- **Priority of Service Benchmarks:** Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- **PA CareerLink® centers** serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self-service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face-to-face career coaching and mentoring as well as the many other hands-on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

The **Greater Reading Chamber of Commerce & Industry** offered the following comments: The Greater Reading Chamber of Commerce & Industry is concerned that the PA WIOA Combined State Plan PY 2016-2019 will impede our local Workforce Development Board and Career Link to work effectively with our employers and local economic development agencies. The Greater Reading region has been designated as a distressed community. Our manufacturing and health care industries are struggling to fill even semi-skilled openings. A qualified and available workforce is critical to ensure our economic competitiveness.

Our Chamber membership has relied on the flexibility of our Workforce Development Board to prioritize and leverage available resources to address one of Berks County's major industry sectors, manufacturing. The shortage of skilled technical talent in our advanced manufacturing sector that provides family sustaining jobs with benefits has accelerated due to the retirement of skilled baby-boomer without qualified replacements. Many businesses have been forced to already turn away business opportunities. In Berks and our surrounding counties, current open positions for industrial maintenance/mechatronics technicians, CNC machinists, welders, etc. take 4-6 months to fill while more positions become open.

We understand that this manufacturing skills crisis is a state wide issue which we would like to see clearly identified and given priority in the Economic Analysis (pp. 20-28) as well as in (Appendix XIV, p. 263) The proposed Title 1 Training "benchmarks" (p. 10) appear to mandate how funding is to be prioritized. In the past our local Workforce Development Board could effectively set our priorities to invest in targeted industries. From an employer's perspective, the funding stream provided support for critical business services, industry analysis, and strategic partnerships with employers and educational institutions.

To ensure the available resources are effectively invested in jobs and local businesses, will help ensure economic vibrancy and spur large-scale community revitalization. It is important to sustained and grow businesses here in Berks County and PA.

We appreciate your time, and respectfully ask your consideration for more flexibility with regards to how the state intends to prioritize and support the manufacturing sector and opportunities to expand the business – education partnerships that realized dividends at a local level.

Response: We appreciate the comments and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets. We also assure you that local areas will maintain the ability to prioritize industry sectors based on local needs.

The **Greene County Commissioners** offered the following comments:

- Training Expenditures: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-

recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training will negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self-service options both inside and outside of PA CareerLinks is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face-to-face career coaching and mentoring as well as the many other hands-on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

Harrisburg Area Community College offered the following comments:

- The proposed WIOA state plan is not clear on its expectations regarding accountability and performance indicators. WIOA has a set of performance indicators that will need to be measured, however Perkins also has required performance indicators to measure. The conflict of these indicators is troublesome and, if implemented, will be overly burdensome. A more important fact to consider is that Perkins Reauthorization is expected shortly. It would seem to be a difficult task to rectify this issue now considering that we won't know for certain what Perkins V will require until it's reauthorized. Perhaps delaying the implementation of the statewide plan would be advisable so that these uncertainties can be adequately addressed.

Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re-evaluate the fit between Perkins and WIOA as federal guidance becomes available. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor's goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to include Perkins as part of the WIOA state plan.

- The proposed WIOA state plan specifies that there is required training from secondary and post-secondary institutions during the "transition" period. Details as to what that training is expected to look like would be beneficial so as to, as much as possible, provide similar training throughout the state. Considering that the training is to be provided locally, this lack of direction feels urgent because there are no best practices to provide guidance.

Response: We appreciate the comment but are unsure what specifically the commenter is referring to and therefore do not offer a response.

- Generally speaking, from a Perkins stand point, it would seem that more direction from the U.S. Department of Education would be helpful and beneficial to Pennsylvania's Department of Education. Knowing what the federal government wants from the state could provide some much-needed guidance in how to move forward with WIOA.

Response: We agree that guidance from USDOL and USDE would be beneficial.

Ray Overholt, **Hermitage House Youth Services**, offered the following comments:

- Training Benchmarks: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system is much more than training, and a look at the bigger picture is

warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- **Priority of Service Benchmarks:** Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. This will have a significant impact on the local area's ability to meet the critical needs of dislocated workers from Joy Mining, General Electric Transportation Services (GETS), and other employers that are experiencing reductions in the workforce.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- **Transitional Jobs:** NW PA WDB applied for and received funding from the Workforce Innovation Fund (WIF) federal grant program to target the population described in this section of the State plan as priority of service. The requirement to spend Title 1 funds for this group will negatively impact the ability of staff to meet the goals of the federal program. Flexibility in the state plan for the local board to determine how or what funds are used to meet the requirements is advised. Additionally, the need to get approval from the commonwealth to transfer funds from Title 1-B funds from Adult to the Dislocated Worker Program will negatively impact our ability to be responsive to the needs of dislocated workers in the area such as GETS and Joy Mining.

Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs. Regarding transfer of Title I funds, the commonwealth will review requests to transfer funds as quickly as possible to ensure service delivery is not disrupted.

- **Employer Services:** A definition of High Quality Jobs is necessary to determine the focus of employer services. Recognizing that many of the openings are low end and replacement for turnover and not going deeper into the data is a concern. There are many job seekers that do not have the skills for a higher level position and employers that need to fill these positions in order to vet a new employee that may move up a career pathway/ladder. Also this is cause for concern in prioritizing employers for services that they are begging to have. The plan, in general, does not cover many employer services. The focus is on funding which follows the job seeker and is targeted (70%) to those with barriers to employment and prioritizes three areas 1) recipients of public assistance 2) other low income individuals and 3) individuals who are basic skills deficient.

Response: We appreciate the comment and recognize some subjectiveness in the term "high-quality jobs," although the plan outlines characteristics of high quality jobs (reasonable wages, benefits, full-time stable employment, advancement opportunities, etc.) in the introductory language under Goal 4. While the State Plan emphasizes and encourages high-quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high-quality jobs. We also agree with the commenter that the workforce development system can only be successful if it is responsive to the needs of employers. Goal 2 focuses on developing a pipeline of workers to meet industry needs and Goal 4 speaks to engaging employers and being responsive to their needs.

- **Data Collection (comments 5.1 through 5.7), ROI & Market Penetration (p. 32 table):** While we recognize the importance to protecting data, as a local partner the WDB will need to utilize the information to make local decisions that are not necessarily interesting to the commonwealth. The state plan does not clarify what access the local board will have to the data. In addition the definition for ROI and market penetration are not clear. If employers are not eligible because they do not qualify for services due to high turnover or low wages (p. 29) it will be impossible to meet the imposed requirements. We encourage the commonwealth to share the raw data with the local areas so that improvements in the system can be made.

Response: The commonwealth must ensure the integrity and security of data among all partners and programs. As the volume and diversity of workforce data grows, so too do the opportunities and challenges of sharing information among all involved. We are committed to expanding access within the parameters outlined by statutes, regulations, and policies that govern the release of this data. Additional clarity for the ROI and market penetration measures will be provided once final WIOA regulations are released.

- **High Priority Occupations (HPO) List and High Turnover Positions:** It is admirable that the commonwealth wants to reduce the high turnover rates and focus on retention, but without a change in the method for developing the HPO list it will be nearly impossible. Given the principle of consumer choice used at the PA CareerLinks(R) it is unlikely that we will experience a

reduction in the number of individuals requesting training that is on the HPO list to focus on positions where the turnover is low.

Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned.

- **Workforce Development System - Alignment Strategy:** This is an area that can be improved in the PA CareerLinks® and I am pleased to see that the commonwealth recognizes the need. Each partner in the PA CareerLinks® should be willing to serve each client that enters and share the information with all professionals employed in the site.

Response: We appreciate the comment in support of this effort.

The **Housing Authority of the County of Beaver** submitted the following comments:

- **Training Expenditures:** While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- **Priority of Service Benchmarks:** Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- PA CareerLink® – Online Services as an Enhancement: PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self-service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face-to-face career coaching and mentoring as well as the many other hands-on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

Human Services Center Corporation offered the following comments:

- Employment Second Quarter After Exit and Fourth Quarter After Exit: Specific to youth, the chart does not mention education (or the military) and yet many of our ISY will continue on to college. Furthermore, the State Plan clearly prioritizes post-secondary education in the goals and the economic analysis. So, will those who continue on to college be counted in this statistic and reporting requirement?

Response: The placement of youth into education/training/military/apprenticeship will continue to part of the youth employment outcomes.

- Employment Second Quarter After Exit and Fourth Quarter After Exit: The youth rates projected for 16/17 and 17/18 for second and fourth quarter are both set at unrealistically high levels. Longitudinal national studies document the success rate of this at-risk youth population to be significantly lower even with engagement in a program. Furthermore, if you do include the college bound students, Federal Department of Education longitudinal studies as well as groups such as the National College Access Network note the first year drop-out rate of low-income students to be over 40%.

Response: WIOA presents many new performance measures and goals. For many, there is little or no baseline information. The targets as expressed in the plan represent a starting point for conversations among providers, partners, and policy-makers.

- Employment Second Quarter After Exit and Fourth Quarter After Exit: If college bound students are counted in the youth statistic and reporting requirement, it should also be clarified if the conclusion of the spring term/semester will be sufficient evidence of retention as the end of the Fourth Quarter is June (a period that most college students are on summer break).

Response: We appreciate the comment and will provide additional guidance upon finalization of WIOA regulations by the federal government.

- Furthermore, if proof of college enrollment is needed, we would recommend that Student Tracker by the National Student Clearinghouse (a nationally renowned resource in college access) be recognized as one of the acceptable means to document a student's enrollment in college.

Response: The commonwealth will consider the use of "Student Tracker" and other programs for proof of college enrollment.

- Definitions of Eligibility: One of the basic eligibility requirements that an ISY could meet has been "An individual who requires additional assistance to complete an educational program or secure or hold employment, as defined by the local or state plan." There is no definition of this in the current version of the State Plan – will this be defined at the local level? We would encourage any definition to be broad enough to include a written letter from the high school counselor as sufficient documentation.

Response: The commonwealth details on pages 87-88 of the final State Plan that "Due to the uniqueness of Pennsylvania's 23 local areas and the varying levels of resources available, local workforce development boards will establish a definition, along with eligibility documentation requirements, for the "requires additional assistance to complete an education program or to secure and hold employment" criterion. This policy will be developed by each local board and will be required to be submitted to the commonwealth as a component of the WIOA Local Plan. To assist the local boards with this task, the commonwealth will convene panels of local representatives to develop recommendations on definitions and interpretations of the term "requires additional assistance to complete an education program or to secure and hold employment."

- An essential point to make in general about ISY and the new focus on retention at the end of the second and fourth quarter is that there needs to be additional funding for providers. This is a major shift from making follow-up services available to tracking retention which will require

additional staff resources and thus funds. With no new funding available, local boards may need to re-assess how much they are paying providers per youth and how many people are being served.

Response: The Department of Labor & Industry allocates WIOA Youth funds in accordance with federal requirements. Local flexibility allows local boards to utilize such funding in a way that fulfills the vision, goals and strategy of the local workforce development area, as well as meeting both Federal and state mandates. Additionally, local boards are encouraged to leverage these funds with other workforce funds to meet the needs of youth in their respective local areas.

Dean Marino, **InSpiriTec, Inc.**, offered the following comments:

Many disadvantaged groups excluded from full employment have benefited from the emergence of information and communication technologies over the past 25 years. During the early 1990's InspiriTec's management team, working at the University of Pennsylvania, was among the first groups in the country to develop computer training courses for people with disabilities. This organization, the Center for Information Resources, was founded by IBM (and its Philadelphia customers), with additional funding by and partnership with OVR, and established at the University of Pennsylvania. Our innovative approach was recognized by the Wall Street Journal in 1997 for showing the potential of technology to "level the playing field" when it comes to developing meaningful employment opportunities for people with disabilities in the provision of commercial services. By 2000, InspiriTec had leveraged its technology and vocational rehabilitation expertise to open in-bound, complex problem resolution contact centers, while affirmatively employing large numbers of people with disabilities supported by Embedded Support services. This model was one of the first social enterprise work strategies in the country and was recognized by the US Department of Labor in 2006 with its New Freedom Initiative Award for having a positive impact on employment for people with disabilities. Today, we employ 462 people with disabilities in Contact Center and IT Help Desk work for the US Department of Defense, US Army, Commonwealth of Pennsylvania, State of New Jersey and many commercial companies (PECO, American Dental, etc.). This work has created one of the most experienced and competitive teams in the field – a field considered by many to be a "nontraditional," yet a thriving, group of enterprises which affirmatively employs professionals with disabilities.

From our unique vantage point, we see a bright future ahead for any individual with a disability who chooses to follow his or her employment dreams of a professional information technology customer service career earning competitive wages and benefits, and we stand firm in opposing any new regulation language that creates the potential to reduce choices presented to OVR consumers, especially choices to pursue work in the "High Priority Occupations (HPO)" like those created by InspiriTec over the past 25 years. Therefore, we support the current state WIOA plan draft's strong emphasis on offering OVR consumers informed choice in employment options, although we strongly recommend more clarifying language around this topic.

As an competitive IT and Contact Center enterprise with a mission to advance employment for persons with disabilities, we both applaud and support both the policy and priority of "Employment First" as

expressed in the State Plan. We believe that all efforts should be made to advocate for and effect employment in competitive-integrated settings in keeping with OVR consumers' strengths, resources, priorities, concerns, abilities, capabilities, interests and informed choice.

And yet, woven throughout the state's WIOA plan are over 14 instances supporting the importance of offering "an array of service choices for OVR customers throughout the state." On the surface this is encouraging since we believe an individual must be provided every opportunity to make an informed choice consistent with the principle of self-determination, as we recognize the needs and desires of individuals who have disabilities are broad and diverse. Measuring "choice" or quality of choice, however, is sometimes where noble intentions create narrow-minded standards that become disconnected from the perspective of the OVR consumer's personal needs and interests resulting in a one set measure (sometimes labeled "preferred outcome"). We request more clarification around the concept of "informed choice" to include, but not be limited to, adequate information about the options that are considered, including: the opportunity to explore and discover the range of options; sufficient resources to support the choice; willingness to accept the choice and the reasonable risks associated with the choice; and information on the parameters of the choice and the relevant options considered consistent with the capabilities of the individual involved in the choice-making process.

Informed choice frees OVR consumers to decide "optimal outcomes" for themselves, yet much of the current state WIOA draft plan prescribes "optimal" or "preferred" or "priority" outcomes in terms of competitive, integrated employment with little to no discussion of other acceptable outcomes or prioritization. Adding to the uncertainty is the inconsistent terminology used to describe competitive, integrated employment (confusingly referred to as: "competitive employment," "community-integrated employment," "community based competitive employment" – all to represent the optimal outcome). The current state WIOA draft does not seem to recognize each person has individual needs and that a one standard metric will fail to truly measure quality of life as presupposed by the definition used to describe "integrated" workplaces. Quality of life assumptions such as community integration need to be assessed by the individual's needs and desires and not a one-size-fits-all mentality. Therefore, it is impossible to assign a statistical measure of "integration" using numbers such as ratios of co-workers with disabilities. Fixed measures on the meaning of integration can have harmful unintended consequences. Consider, what do we tell an OVR consumer who places a high value on maintaining and growing his or her peer relationships since "integration," as conceived by WIOA regulation, essentially devalues the opportunity for relationships disabled build w/ their disabled peers?

As InspiriTec, and many other organizations have proven, OVR referrals who choose jobs offering opportunities to interact with their disabled peers, are in no way necessarily opting for exploitive work environments with low expectations for performance and their contribution. (Often presumed by some in the civil rights community.) To the contrary, hundreds (if not thousands) of OVR referrals have come to see InspiriTec as just the opposite, which is why we have become a preferred employment choice among those seeking a professional information technology customer service career. Yet, the current language within the state WIOA draft plan, if not clarified, leaves considerable ambiguity around where certain work options, such as those with InspiriTec, would fit into the OVR prioritization. Indeed, our

history demonstrates each time we launch a new contact center project the number of qualified OVR-referred applicants significantly exceeds the available openings. OVR consumers are not only choosing InspiriTec, they're stabilizing and maintaining employment with us while gaining skills to be promoted within and moving up to positions outside of InspiriTec. There is very little risk of retention failure relative to other competitive, integrated placements with outsourced supported employment services. This is because our work environment maintains BOTH the performance expectations of any large, successful corporate business and the Embedded Support services provided by our in-house professional case managers. In this way, OVR consumers are able to earn competitive, market rates in an environment that integrates performance expectations typically found in the community which produces a service quality also at a level typically found in the community.

InspiriTec functions as a competitive, integrated workplace:

- High Frequency Interactions with General Public. Each week contact center agents can have hundreds of interactions with the general public over the phone and via other communication tools. These interactions, like many aspects of a typical contact center operation, are measured and reported objectively in great detail. In fact, at least 75% of an agent's time is spent interacting with general public customers. Standing Federal WIOA language has acknowledged that interactions need not be face-to-face in the case of the at-home/self-employed worker (to be considered a competitive, integrated workplace). Therefore, it stands to reason that facility-based agents serving general public callers via phone and other communication channels are equally integrated in terms of their interactions with general public.
 - In the case of an average contact center, general public interactions are likely significantly higher than an average at-home, self-employed person. Not only are facility-based agents frequently interacting with the general public, they're avoiding the inherent risks present when people with disabilities work at home as they become excluded from any face-to-face interactions and supportive services.
- Interaction and Exposure to Management and Supervision. Agents who work in a facility-based environment have a far greater opportunity for face-to-face interactions with supervisors, management, technical and executive colleagues. These opportunities provide far greater potential for professional growth and career advancement. Many InspiriTec managers and directors, many with disabilities, have gained career advancement within InspiriTec as a result of this level of interaction and exposure within a facility-based model.
 - Many IT and Contact Center work projects often have data and site security requirements that cannot be met by a workstation operated off premises. Such home locations limit work opportunities for home bound people with disabilities.
- High Quality Interactions. Agents are engaged in diverse, non-repetitive communication tasks. Each caller served is unique presenting a wide variety of scenarios that must be assessed and handled using a variety of techniques and tools. Interactions require a two-way exchange of information, not a simple scripted greeting. These person-to-person interactions, which

comprise most of the work effort and are typically found in other contact centers, require high level of both interpersonal and technical skill.

- **Serving Others Builds Self-esteem.** InspiriTec positions are service jobs whereby our employees increase their esteem and self-worth by helping others in need and receiving gratitude and praise from those served.
- **Integrated Performance Standards.** All agents, disabled or nondisabled, must meet the same performance standards as per our customers' contractual service level agreements. There is no exception. Many times InspiriTec takes over projects from large incumbent vendors such as HP, Serco, etc. and delivers the same level of service while employing predominately professionals who happen to have disabilities.
- **Common Office Space.** The physical layout of our facility offers all employees shared conference rooms, lunch rooms and restrooms for management and staff alike. This is no area set apart for individuals with disabilities to perform their work tasks.
- **Personal Work Space.** All employees are provided with desks, cubicles or personal spaces where they may keep personal items. Workspaces are not arranged or designated or segregated by disability or any other distinction.
- **Facilities Location.** Facilities are located in areas around other businesses and community services such as public transportation, restaurants, shopping, etc. Employees can and do easily leave the facility to go to lunch or for a break and enjoy other community offerings.
- **Competitive Employment.** All employees earn competitive, market wages with benefits and opportunities for promotion.
- **Maximum Hours.** We offer employment for the maximum hours consistent with the person's abilities and preferences, amounting to an average of at least 20 hours a week for all projects.
- **Embedded Support Services.** As part of its unique business and operational model, InspiriTec provides scalable Embedded Support services to ALL employees. The purpose of InspiriTec support services is to remove all barriers for employees such that they can effectively perform at their jobs. Services can be directly disability related, such as assistive technology, or be support services and resources which are impacted by disability but not specifically disability related. Examples of the latter include: housing assistance, transportation, counselling, support for PTS and other mental health and behavior issues, domestic relations etc. InspiriTec's embedded support services are a part of the overall management structure and work closely with operational managers with the dual and shared goals of providing accommodations to employees to assure effective employment and career growth for our employees, while providing world class services to InspiriTec's contact center and IT customers.

Response: We appreciate the comments and note that WIOA makes competitive integrated employment the preferred outcome for persons with disabilities. However, neither WIOA nor the state plan eliminates other options.

Additionally, a number of **InSpiriTec, Inc.** employees shared personal stories:

What OVR and InspiriTec mean to me: Without the referral from OVR I would not have the career that I have right now. Before working for InspiriTec I was already a consumer of OVR. I completed many job applications that did not result in a job. I was so happy to have the choice to go to InspiriTec through OVR. What InspiriTec has given me is self-confidence, a can-do attitude and support. The word disabled is something that I am still not used to even after over five years because we all are human not perfect but special in our own way. InspiriTec makes us more special by focusing on our talents not our physical nor mental disadvantages. Without OVR I would not have InspiriTec or career, a successful new and current life as a hard working woman. I am also surrounded by an extended family who is rooting for me. ~ Susan Graham

Hello, my name is Hope Sinnott and I work at Inspiritec. This has been a blessing for me. I have made numerous unsuccessful attempts at finding employment over a period of 3-6 years. Inspiritec is a great place to work. I started at OVR, and was able to go through job training from the Academy a program for people with disabilities. I updated my skills and was able to perform this job description, it is actually my Dream Job, I don't understand why more companies do not employ people with disabilities. We have a diversified group of people here working. I was able to get my Medical Coverage, and even a job coach who took the time to sit and help me, along with services provided that another employer wouldn't think of doing for their employees. Since working here I started a bank account, and I am learning about a 401K plan just like any other worker in Philadelphia. My family see's the effort I am making to improve the quality of life for me and my family, with Inspiritec I am able to do that. Some/A lot of companies have written us off as being useless and unemployable this is not so with Inspiritec, they see us differently as teachable and employable in several capacities, I wouldn't have the quality of life I have now, Imagine ME Hope Sinnott working, growing thriving in a paid position. I wouldn't have been able to live and progress as I do here. In all honesty I don't see why anybody would not want to help people, who are willing to help themselves and the company who believes in them. It would be very sad if an organization like Inspiritec didn't exist.

My name is Princy Mathew, and I am a customer service representative at InSpiriTec. I am a Paraplegic due to a spinal cord injury from an accidental fall in December of 2009. Before then, I was a nursing student. My early days of being wheelchair-bound were difficult. I struggled with the pain, the isolation, and the sudden realization that my life was going to be different forever. But after two years of extensive surgeries and treatments, I came into contact with OVR through my social worker. Such like the incident, this changed my life, but it also helped me in many ways. InSpiriTec promoted independence. The more I worked with employees of different backgrounds, the more aware I became of achieving things without solely relying on others. The accommodation that was provided for me, as well as other employees, helped me physically, emotionally and mentally. Choice is freedom, and as a disabled person, that freedom or the ability to choose becomes less obtainable. Although it was my social worker through OVR that helped me get the job, it was my choice to pursue it. We, as people of the United States, should always be given a choice. To take away any sliver of that is against what everyone fights for – freedom, to have more than one plate offered to us. As an American – no, as a human being – the ability to choose, such as where to work, is essential and should not be restricted.

InspiriTec offers permanent, competitive employment positions for individuals whom are often overlooked. Just because an individual is walking with the assistance of a walking device does not make this individual any less capable of fulfilling/meeting the expectations of a competitive profession. Working as the Case Manager at InspiriTec's Reading, PA office I have the privilege to advocate/provide support to our employees, my colleagues many of whom have verifiable disabilities. We empower them to reach their career aspirations while earning a competitive wage. This is truly rewarding to me since I myself suffered a traumatic brain injury in 2003 and without the services and accommodations offered, I would not have the opportunity to work at InspiriTec. My accident couldn't have happened at a worse time, it was the beginning of my senior year of high school, I was thinking about going away to college. But little did I know my course of life was about to change. I was miserable, in pain and weak from all my time in the hospital. But, I wasn't about to give up. I knew my life was going to continue; therefore I put my game face on and graduated high school! I had to be homeschooled through the summer, in order to graduate on time. Then I needed to enroll in college, but I couldn't go away to college, like I had planned to. Yes, it was a disappointment but at this time I was not dependent and required a lot of help with some of the most, basic every day skills. It came to a point where, I had to be realistic and stay local so that I could continue physical therapy, work on myself, and try to regain my mobility. So...I enrolled at a community college, knowing that my learning capacity was not the same; I required ADA accommodations. In addition to the accommodations, rather than graduating with an Associate of Arts (AA) in two years, it took me three. I then realized that I needed more education, so immediately after receiving my AA I continued on for my Bachelor's (BA). After completing my BA in Psychology, I found my passion! Through my learning about the study of mind and behavior, I was able to better accept my disability; which led to my desire to help others like me! While the ADA has helped improve options for disabled individuals, the reality is that it is extremely difficult to secure employment. InspiriTec, due to their years of experience and innovative leadership as an IT enterprise and affirmative employer of persons with disabilities, has made a significant impact in helping their employees secure a solid career path by combining the use of technology. I oppose any new language, constraints, or regulations that would create the potential to reduce good, career enhancing choices presented to OVR consumers, especially choices in the High Priority Occupations. Consequently, I support the current state WIOA plan draft's strong emphasis on offering OVR consumers' choice in employment options; including Employment First, and use best efforts to achieve competitive-integrated employment; but, not at the exclusion of choice in affirmative enterprises. Perhaps clarifying language could be developed to highlight the unique differences that many disabled OVR consumers face. I think it is unfair to limit/change opportunities to an already under represented segment in the workforce. I am thankful for my OVR experience and would be happy to provide personal testimony on my experience. People with disabilities have the same rights as everyone to make decisions about their lives, including the right to take risks and make mistakes. The idea that "Respect for the freedom to make choices should be given to all persons with disabilities, no matter how much support they need" (Degener, T. 2014); is evident in the support I am providing to my colleagues, and the support they provide to each other, regardless of disability. Through my disability and understandings as a working professional with a disability, I am able to advocate for our organization and affirmatively support the culture necessary on behalf of our unique environment. ~ Nadine Schaeffer

My name is Donna M. Rodriguez-Canty. I work at InspiriTec, which is an organization that is an affirmative employer of people with disabilities. My work is important because as a disabled individual who has not been able to be employed with my diagnosis prior to this past year for a period of three years, I had been discriminated against because my diagnosis affected my work performance on other jobs and I could not sustain them without understanding employers who could accommodate me and understand my dilemma. I choose to work here because this company understands the diverse needs of persons with disabilities and don't feel as though I need to live a lie about my issue and am free to grow and utilize the assistance of the staff who can deal with me with empathy. If I didn't have this choice, I would probably be unable to maintain my bills, work in an environment where my skills are valued as a disabled person or maybe be in jail for not taking my medication due to depression because of my economic situation.

Response: We appreciate the personal testimony offered by all of the commenters.

The **Institute on Disabilities at Temple University** offered the following comments:

On behalf of the Institute on Disabilities at Temple University, we thank you for this opportunity to comment on the proposed Workforce Investment Opportunity Act (WIOA) Combined State Plan. The team developing this plan has crafted a comprehensive plan that looks to maximize access to the workforce for people with disabilities by working to remove barriers and improve access. For more than 40 years, the Institute on Disabilities at Temple University has served as Pennsylvania's University Center for Excellence in Developmental Disabilities (UCEDD) Education, Research, and Service, established under the federal Developmental Disabilities Assistance and Bill of Rights Act. Further, the Institute, through our Pennsylvania Initiative on Assistive Technology (PIAT), has served as the Commonwealth's federally funded Assistive Technology Act program since 1992. We respectfully submit the following comments and recommendations.

- Plan should detail available supports, timelines and process related to high school transition. It was difficult to assess from the plan whether there was sufficient detail about how support services related to transition from school to work will be arranged, funded and assessed. At a minimum we recommend that the plan detail the following:
 - OVR begins working with students with disabilities (on an individual basis, not just outreach and information) a minimum of 2 years prior to graduation.
 - The approach to individual transition planning has an objective of making the last day of school and the first day post-graduation look the same. Namely, students should have employment that they keep after graduation, not employment "slots" that the school maintains for currently enrolled students.
 - Blended or braided funding guidelines and responsibilities are outlined so that students/youth are not subject to delays in services and supports because of the "payor of last resort" disputes which historically have caused major delays.

Response: We appreciate the comments submitted. PDE will continue to collaborate with OVR/DHS by informing OVR of IEP meetings and inviting their participation in planning for students with disabilities.

- Establish in policy that Adult Training Facilities have no place in assessment or volunteer/work opportunities while in school or post-school transition. Adult Training Facilities are an archaic model of service and should be phased out of service in Pennsylvania.

Response: We appreciate the comment and note that under WIOA a young person will not be referred to a sheltered workshop without having the opportunity to access career counseling and employment services first.

- Expand and Improve the Early Reach Initiative. Early Reach is an excellent initiative and the capacity of this program should be expanded by adding more counselors, increasing their role and providing additional and on-going training of these counselors.

Response: We appreciate the comment in support of our Early Reach initiative. The Early Reach Initiative continues to expand throughout Pennsylvania reaching transition age students with disabilities students in public, private, charter, cyber and cyber-charter schools. Early Reach Coordinators continue to develop presentations and resources that align with pre-Employment Transition Services to prepare students with disabilities to work with OVR.

- Build the capacity of PA's employment professionals to support people with the most significant disabilities and to address barriers to employment which are related to misunderstandings about the relationship between SSA benefits and working.
 - The Combined Plan should lay out specific training strategies to build the capacity of employment specialists to successfully obtain and maintain employment for people with the most significant disabilities.
 - We know that a major barrier to employment for many people with disabilities is the myth/misinformation about working and loss of benefits. The Combined Plan does not address this need. OVR Counselors and employment service providers should have education and training on the fundamentals of benefits and work incentives. Further, as a state, we need more trained and certified benefits counselors to meet the demand. Our existing Certified Work Incentive Counselors cannot meet the demand for their services in a timely fashion.

Response: We appreciate the comment in support of this strategy that OVR Counselors and employment service providers should have education and training on the fundamentals of benefits and work incentives.

- Our understanding is that OVR's policies related to supported employment are being revised to reflect the new WIOA policies. We recommend that OVR's proposed supported employment policies are made available for public comment prior to adoption.

Response: We appreciate the comment. Any State Board of Vocational Rehabilitation-approved OVR policy would receive public comment.

- Because there are such significant financial implications, provide clear definitions for terms like “youth” and “graduation” and use consistently. The definitions and the attached delineations of funds available are confusing. To avoid confusion about roles and responsibilities and availability of resources, clarify the terms and the roles and responsibilities of each service system. We believe that employment opportunities and support need to begin while youth are still enrolled in school. Research highlights how youth with part-time job opportunities during the high school years are able to more easily move into employment after they leave school. Job readiness, social skills, and indicators of independence and quality of life are all increased with greater employment opportunities during the high school years. Additionally, we must ensure that these definitions and the way in which they are presented does not encourage people to push dis-enrollment from school to shift responsibility to OVR so that federal funds for both Out-of-School-Youth and Adults can be leveraged instead of funding from the school district.

Response: We appreciate the comment and support the need to clarify terms and the roles and responsibilities of each service system, which will be done through program specific policies. Unfortunately, some definitions differ depending upon the program making it difficult to provide across the board definitions in the state plan.

- Education for people with disabilities, families and school transition coordinators regarding changes in policy related to sheltered workshops is essential. Self-advocate and family education regarding the changes in placements to sheltered workshops is critical for Pennsylvania’s compliance with the federal HCBS settings rules and section 511 as well as truly adopting an “employment first” policy. Further, transition coordinators in schools are often the people looked to for assistance with planning for life after high school. They must be well educated about the adult service system and expectations for employment. A comprehensive training and communication plan should be developed to ensure that people with disabilities, families and transition coordinators are well-informed about employment opportunities and supports. The Institute recommends a collaborative effort among PDE, DHS and OVR.

Response: We appreciate the comment and recommendation for OVR/PDE/DHS to collaborate in the development of a comprehensive training and communication plan. PDE would be pleased to work with DHS on developing a training strategy for school based IEP teams related to secondary and postsecondary work, including integrated employment and educational opportunities.

- (Goal 2.10, p.12) This section references the policy of Pennsylvania as an “Employment First” state. Pennsylvania certainly should be an Employment First state but the Commonwealth needs an Executive Order or legislation to make this policy official. Pennsylvania should

formalize the policy that we are an Employment First state and then address implications of being an Employment First State.

Response: We appreciate the comment and agree that the commonwealth should be an "Employment First" state. An Executive Order was issued by the Governor on March 10, 2016.

- (Section IV, Vocational Rehabilitation Programs, Coordination with Education Officials, p. 117) The Institute agrees with the Disability Rights Network of PA's comments and recommendations that "Under WIOA, OVR is reminded that it must re-evaluate that youth on at least a yearly basis. We recommend that information concerning its written policy and procedure for the re-evaluations be followed on a statewide basis, tracked, and made available on OVR's website and/or to the Pennsylvania Rehabilitation Council, DRN and the Client Assistance Program (CAP), on at least a quarterly basis." The Institute also supports DRN's recommendation that youth who do not choose to apply for OVR services the first time they are approached be re-approached on at least a yearly basis. This information should also be tracked and shared as outlined in the previous comment.

Response: We appreciate the comment regarding the importance of tracking and sharing information with stakeholders. OVR continues to explore and develop innovative services and supports for individuals with disabilities while we await the release of final regulations, guidance, and technical assistance on Section 511 Limitations on Use of Subminimum Wage.

- (Coordination, Alignment and Provision of Services to Employers, Page 50) The Institute supports the PA APSE concern about the following passage: "All Pennsylvanians exiting basic education services, both through the traditional K-12 system and through adult basic education, will be prepared to participate successfully in postsecondary level instruction with no need for remediation. To support this vision, Title II adult basic education providers are implementing the College and Career Readiness Standards for Adult Education...Students who do not earn a high enough score on placement tests at the postsecondary institution are referred to a local adult basic education program for remedial work. After the student has demonstrated sufficient academic progress at the local adult education program, as determined by an approved standardized test, the student is referred back to the postsecondary institution." Like the PA APSE we recommend that there must be a provision for students who are in special education who may not pass standardized tests. The development of training programs to get youth with significant disabilities 'ready' for work is something that we are moving away from as decades of experience has shown that this doesn't work (see PA APSE White Paper on Employment). We respectfully suggest that wording be included to create accommodations for those students that may not meet the qualifications presented above.

Response: The statement referred to in the comment is specifically addressing the role of Title II adult basic education programs in supporting students in those programs to successfully

participate in postsecondary education/training. The commonwealth recognizes that students who are in special education may require accommodations.

- With regard to resources available on the Commonwealth Workforce Development System (“CWDS”) (p.70-71), the Institute advises the online training be fully accessible, e.g. as part of the procurement requirements if the provider will be a source other than the Commonwealth.

Response: In order to be ADA compliant, all training courses are required to be available in a variety of formats. The commonwealth mandates that all the PA CareerLink® centers provide reasonable accommodations, including programmatic accessibility.

- Under Vocational Rehabilitation Programs, (p. 111 under 4.b.) make sure all communication is accessible. The text reads, in part, “all OVR web information to ensure that current brochures and publications can be provided in large print, Braille or read by *using alternative speech recognition technology.*” [italics added]. The italicized phrase should state “able to be read by ‘text to speech technologies’”, referring to the technology that takes written text (as in a document or on a website) and provides speech output (e.g. JAWS). The reference to “alternative speech recognition technology” is incorrect; speech recognition technology is that which converts spoken words into text (not vice versa).

Response: We accept the comment and will make the correction as outlined by deleting "using alternative speech recognition technology" and replacing it with "text to speech technologies".

- With respect to the section titled “Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System,” page 115 states: State programs carried out under section 4 of the Assistive Technology Act of 1998. Pennsylvania’s Initiative on Assistive Technology (PIAT), a program of the Institute on Disabilities at Temple University, is Pennsylvania’s statewide program under section 4 of the AT Act. PIAT has agreements with OVR to implement Pennsylvania’s Assistive Technology Lending Library (not, as stated in the plan, “Temple University’s Assistive Technology Lending Library”) and as administrator for Pennsylvania’s Telecommunication Device Distribution Program (not “Telecommunications”). This section of the plan is meant to address programs carried out under section 4 of the AT Act: Although it is certainly a valuable resource and a subcontractor to PIAT, the Pennsylvania Assistive Technology Foundation (PATF) is not implemented under section 4 of the AT Act. Activities that are provided by PIAT, as Pennsylvania’s AT Act Program, are: device demonstrations, device lending, device reuse, public awareness activities and trainings to raise awareness and knowledge of AT topics. Any of these activities are available to OVR staff and clients (mostly at no charge). However, we believe it is the intent of this provision in WIOA to encourage collaborative fee-for-service arrangements between the OVR and the AT Act program. For example, the Oklahoma Department of Rehabilitation Services (DRS), as part of WIOA, has contracted with Oklahoma ABLETech for more than \$200,000 of services ranging

from accessibility testing, to demonstration centers in workforce development sites, to authorizing and monitoring all AT purchases requested through DRS.

Response: We accept the comment and will make the correction as recommended.

- Section titled “Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development”, page 128 states: Staff Development. Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:
 - (i) a system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; (emphasis added) and
 - (ii) procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

The response to this section does not make any mention whatsoever of using any resources of or collaboration with PIAT, the state’s AT Act Program. Because WIOA requires collaboration with the AT Act programs, PIAT would welcome the opportunity to become more involved with the staff development with regard to assistive technology.

Response: We appreciate the comment in support of our approach. OVR encourages continued collaboration with PIAT.

- On page 141, the draft states “The Pennsylvania Assistive Technology Lending Library (PATLL) provides the opportunity for any Pennsylvanian to borrow and assess AT devices prior to purchase. The library is located on the HGAC’s campus, and the services are free to all Pennsylvanians with disabilities.” The statement should read: “Pennsylvania’s Assistive Technology Lending Library, supported largely by a state appropriation and supplemented by federal funds under the AT Act, provides the opportunity for any Pennsylvanian to borrow and assess the usefulness of an AT device prior to purchase. Devices may also be borrowed as a temporary accommodation (for employment, post-secondary education, or similar purposes).” Further, the statement needs to clarify that the centralized inventory for this program is located on the HGAC campus; devices are shipped to/from borrowers at no cost from this location. The regional subcontractors of PIAT, the state’s AT Act Program, facilitate the selection, borrowing, and use of these devices across the state.

Response: We accept the comment and will revise the language on page 140 in part, excluding reference to the sources of funding.

- On page 141, the plan states that a “separate policy related to the provision of AT services and devices has been identified as a needed guide for OVR to address the increasing demand for “off the shelf” technology to provide parameters to meet the AT needs of VR customers in a cost-effective and consistent manner.” We propose that as the AT Act program for Pennsylvania, PIAT be a key collaborator in this effort, especially given the expertise of PIAT’s credentialed AT staff.

Response: We appreciate the comment in support of our approach and agree that PIAT should be a key collaborator.

- Also on page 141, the plan states: “OVR collaborates with the Pennsylvania Institute on Assistive Technology (PIAT) at Temple University to participate in training, maintain the PA ATLL, and develop AT resources for Pennsylvanians with disabilities.” The correct name for the state AT Act program is Pennsylvania’s Initiative on Assistive Technology (PIAT) at the Institute on Disabilities at Temple University. We look forward to new collaborations with OVR to “develop AT resources”.

Response: We accept the comment and will make the correction on page 141 as recommended.

- Another possible inaccuracy is found on page 149, under “3. Educate staff on accessibility and technology based upon universal design principles.” The response includes this sentence: “The Center for Assistive Rehabilitation Technology Lending Library...” Please clarify: does the CART have its own lending resources? Or is this a reference to Pennsylvania’s AT Lending Library (although the centralized inventory for the Lending Library happens to be located at HGA).

Response: We appreciate the comment. As a point in clarification, the CART does not have its own lending resources and any mention of this is in reference to Pennsylvania's AT Lending Library.

- In addition, we encourage you to expand on ways in which OVR contributes to universal design, including but not limited to web accessibility. PIAT is available to support and promote your efforts in this regard.

Response: We appreciate the offer to support and promote this effort.

Darlene Marshall, **Jefferson County Library System and Mengle Memorial Library**, offered the following comments: Please consider libraries as a full partner as you complete your Workforce Development Plan. After reviewing the Strategic Planning Elements and the Goals (pages 7 -19) it looked like libraries would be able to be incorporated into the plan as a partner although I didn't see them specifically mentioned on these pages.

Library's provide wide hours and locations compared to job training centers, as well as one on one help and training for people trying to enter the work force or switch jobs. We see numerous people daily researching jobs, applying for jobs and they often need computer assistance.

Libraries offer the following services:

- provide one-on-one help with resume, cover letter and job application assistance
- help patrons with technical issues when filling out online applications
- provide free computer access for job searches and applications
- provide free computer access for career development and advancement
- provide printed materials for resume building and job searching
- provide printed materials for career development and training
- provide printed materials and online access for career planning
- provide materials about local career training opportunities and resources
- provide space for meetings and programs
- provide services to target populations mentioned in the WIOA

Patrons often come into the library for help looking for jobs online and then filling out the applications. Libraries are of special value to patrons who are older and need help with computer issues during their job search. Many of them feel more comfortable at the library than they would in a career center (we experience this regularly & maybe it is the ease of access to their local library).

Libraries offer many varied aids to people looking to improve their lives, whether through education or career planning. They can offer assistance to the teen trying to learn about the advantages and availability of a future career or school, the job seeker trying to write an outstanding resume and cover letter, the small business start-up with questions about regulations, the adult thinking about a career switch or more training to advance in their chosen career, or the older person trying to get back into the workforce. One of the library's great advantages is the availability of evening and weekend hours. These are a great help to people who may not be able to search for jobs during the regular daytime hours when most career centers are open. Public libraries are deeply involved with workforce readiness, technology, and the communities they serve. A study by the Urban Libraries Council reveals the significant contribution public libraries make to local workforce readiness, economic development, and literacy. View the study here at the following link, especially pages thirteen to seventeen cover opportunities libraries provide to workforce readiness:

http://pages.careercruising.com/rs/509-UHL-105/images/Making%20Cities%20Stronger%20-%20Urban%20Library%20Council.pdf?mkt_tok=3RkMMJWWff9wsRonvKzLZKXonjHpfsX96esoXKawIMI%2F0ER3fOvrPUfGjI4ASMDml%2BSLDwEYGJlv6SgFT7DMMbVo1rgMWxQ%3D

Response: We appreciate your comments about how libraries provide job training, computer skills training, and access to the Internet for jobseekers and businesses in your county, and about the library's

role with older adults who seek employment and how the welcoming nature of libraries helps to connect with people who may be struggling. We note that we made further reference to libraries as system partners on pages 11, 42 and 48 of the final State Plan.

JEVS Human Services submitted the following comments:

- (State Plan p. 8) It is imperative that the workforce development system provide training for skills that lead to employment in High Priority Occupations (HPOs) or entry-level occupations that lead to HPOs. Career pathways must be diverse with multiple entry and exit points allowing individuals of varying abilities, including low-skilled adults and youth with multiple barriers to employment, to have realistic access to pathways.

Comment: The application of multiple entry points within career pathways is a very positive approach that we can operationalize for varying individual employment plans.

Response: We appreciate the comment in support of our approach.

- The commonwealth will mainstream job seekers with barriers to employment to the maximum extent possible by offering realistic entry points into career pathways and by ensuring necessary supportive services are in place and coordinated across agencies, so that those individuals with the most significant barriers to employment are successful in accessing and navigating career pathways. When appropriate, job seekers will be co-enrolled between core and other partner programs in order to provide the most comprehensive services possible.

Comment: Ensure that targeted populations, including low-literacy individuals, non-English speakers, and other groups with barriers, benefit from the implementation of Career Pathways by implementing priority of service requirements; integrating wraparound services, literacy programs, and other basic skills education with training for specific Career Pathways that leads to paid employment, and conducting an outreach program that all stakeholders understand the components and potential benefits to individuals of advancing along a Career Pathway.

Response: The commonwealth recognizes the need to have a variety of service providers working together to ensure that individuals with barriers to employment receive the services they need to benefit from career pathways opportunities.

- The commonwealth will also support placement of individuals with barriers to employment into quality entry-level jobs that provide the work experience and non-technical skills necessary to lead to employment in HPOs, and we will consult with LWDBs and engaged employers to identify the career pathways for which such quality entry-level jobs can serve as “on ramps.”

Comment: This strategy needs deeper acknowledgement that not all of those with barriers will be ready for career pathways as other areas of the plan address (i.e., 1.9). Also, sometimes an effective “on-ramp” may be just getting someone to work for 23 weeks – these issues need to be addressed as this strategy is honed and implemented.

Response: We appreciate the comment and note the recognition of on ramps in Goal 1.7 and requirement that LWDBs expend between 5 and 10 percent of funds on transitional jobs, which may be appropriate entry points for some individuals with barriers.

- The commonwealth will maintain a robust Eligible Training Provider List (ETPL) to include performance data for all students receiving training in all programs, regardless of the funding source for those students’ training.

Comment: The commonwealth should offer an advanced timeline and clear approach to ensure necessary data integration and collaboration happens across all related state departments.

Response: We appreciate the comment and will take it into consideration when establishing ETPL policies.

- The commonwealth will require On-the-Job Training (OJT) and incumbent worker training, whether provided through WIOA core programs or the Industry Partnership program, to be tied to a career pathway.

Comment: Unless the pathway is already an employer-defined one, this goal may be difficult to document and achieve. This strategy may also result in restricted funding to employers. If it were to be implemented, the commonwealth should be prepared to document pathways prior to beginning an OJT and nimbly adopt WIOA-compliant career pathways. This could result in a time and resource drain on staff and employers.

Response: We appreciate the comment and recognize that career pathways need to be defined and refined over time.

- The commonwealth will establish benchmarks for how much WIOA Title I funding must be used for training by local areas to include a set-aside to be used for new and innovative approaches. In Program Year (PY) 2016, at least 30 percent of Title I funding must be used on training, of which 50 percent must be spent on low income individuals and individuals with other barriers to employment. In PY 2017, at least 40 percent of Title I funding must be used on training, of which 60 percent must be spent on low income individuals and individuals with other barriers to employment. In PY 2018 and thereafter, at least 50 percent of Title I funding must be used on training, of which 70 percent must be spent on low income individuals and individuals with other barriers to employment. LWDBs may use other sources of funding, including Industry

Partnership funding, to count toward and offset the Title I training targets.

Comment: Currently, Philadelphia spends 23% on training; this provision removes local control over the best use of Title I funds which currently support many critical services and supports beyond training. A training threshold of 30% (and eventually 50%) will have a significant impact on our programs. If we put 30% into training we will have to reduce the number served. The commonwealth should further consider how service delivery will be impacted by this shift and what will have to change within the workforce system to achieve these benchmarks. Title I funds are limited and other programs exist to support training. This provision is essentially requiring a need that may not exist for every individual. Customers may not be interested in pursuing training or may not be ideal candidates for training.

Benchmarks for spending should be based on an initial analysis of outcomes. Consider setting a training target, analyzing the results, and phasing-in increased levels of spending rather than starting at a 30% mandate. Additionally, if this strategy moves forward, training should be defined as broadly as possible to include soft skills, which employers say is the number one need, and other types of training – not just degrees and tuition – and calculated based on training from other funds rather than only a Title I allocation.

For those with barriers to employment, while it is positive to focus training funds on those with low income and other barriers, spending too much on training may actually reduce support available to those with barriers who may benefit more from working with staff on coaching, supportive services and work experience or internships rather than training. When working with individuals with barriers to employment and trying to incentivize that work, establishing funding benchmarks does not encourage the level of innovation that is oftentimes necessary to achieve this goal.

Important to note that not every workforce development system is the same. Philadelphia, an urban area with high barrier clients, needs greater consideration and flexibility. The local WDB should have this flexibility in presenting a plan to the State. There should not be a hard number to reach, but a range of expectations.

Furthermore this does not address the gap between the basic skills, specifically literacy and math, and the baseline requirements for job specific skills training in high demand occupations. Requests for training are not as scarce as people who qualify for available training slots. Remedial programs designed to address literacy should be strengthened and targeted funding for skills training that is open to low level literacy participants while including robust contextualized literacy components should be prioritized.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- The commonwealth will seek to obtain grants to assist in serving individuals entitled to priority of service and will additionally make discretionary state funds available to support the serving of these target populations.

Comment: We commend this goal as an important one to pursue as it may offer more flexibility in service deliver to individuals entitled to priority of service and other target populations. More dollars are needed for serving priority of service individuals. We encourage that the state have a broad definition of what the 20% of funding for work experiences can include, so it can include activities such as staff time related to career advisement, career exploration costs, etc. in addition to youth wages.

Response: We appreciate the comment in support of the goal of seeking additional grants. We will take the second comment under consideration in defining what work experiences can include to the degree not defined by federal law and regulation.

- Recognizing the new priority on OSY, the commonwealth will identify models and effective practices, including for recruitment, flexible enrollment (e.g. self-attestation, co-enrollment, career pathways and retention) to help local area staff successfully meet the needs of those individuals.

Comment: We thank the state for adopting self-attestation of out-of-school youth status. This ensures that more OSY youth with significant barriers will be able to take advantage of services, since many of these youth may not have the documentation handy to prove they are OSY.

Response: We appreciate the comment in support of our approach.

- The commonwealth will work with the U.S. Departments of Labor and Education, and also with local boards, to ensure that statistical models and negotiated performance levels are established and calibrated so that they accurately reflect the profiles of out-of-school youth being served within the commonwealth and in each local area.

Comment: This position will allow all parties to have a more accurate depiction of workforce activities and population groups within each area and would be helpful as long as the statistical model is sufficiently validated. We support this continuation to ensure enhanced support for youth and alignment between the multiple systems that touch youth.

Response: We appreciate the comment in support of our approach.

- The commonwealth will encourage the co-enrollment of high-risk OSY, ages 18 to 24, as both WIOA Adult and WIOA Youth participants to allow for the leveraging of funds and provision of

necessary services. Where appropriate, co-enrollment in Title II adult basic education services, EARN, TANF and other partner programs will also be encouraged.

Comment: In order to maximize on this strategy, there needs greater concentration of efforts on the adult side (i.e., ages 18-24) in centers. Young males, especially black, young males, produce the lowest performance in common measures data. With a coordinated effort to offer them the full array of services available, we will support this group while helping common measures and aligning with state goals.

We encourage the state to deeply consider what quality co-enrollment would look like and how TANF requirements can be amended to best support individuals entering and staying on career pathways.

Response: We appreciate the comment and will take it into consideration in developing any co-enrollment policies.

- 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.

Comment: These funds must also be made available to the youth workforce system.

Response: The state Education budget has a line item for CTE. The CTE line item as described in the state budget document indicates that the CTE line item is to support school districts and charter schools with approved CTE programs and career and technical centers. Students enrolled in CTE would benefit from JEVS services and perhaps JEVS could contact and work with the public schools.

- Low-quality jobs have high turnover rates and limited opportunity for advancement, bringing into question the return on investment of limited WIOA resources.

Comment: The term “low quality jobs” undermines the meaningfulness of every individual contributing up to their highest capacity. The quality of a job should not only be measured by the pay or complexity, but the intangible interpersonal, coping and creative skills that can be developed in any situation.

Moreover, for people with disabilities, sometimes the job they secure is the only job they will ever have and they love it. The job is not a gateway, but an ideal match where someone with intellectual disabilities can stay for the long-term, keeping turnover low for the employer as well.

Response: We appreciate the comment, but regrettably feel there are "low-quality jobs" and we are trying to reduce the number of them.

- The commonwealth will critically consider job quality in engaging employers and will require LWDBs to prioritize funds to be used for business services activities, on-the-job training and incumbent worker training to those employers offering high quality jobs. The commonwealth will seek to include model criteria for considering job quality in the standardized On-the-Job Training (OJT) contract described in paragraph 4.9 below. The commonwealth will also use these criteria to target Industry Partnerships and similar state- funded workforce partnerships to employers that offer high-quality jobs or jobs that are likely to lead to high-quality jobs.

Comment: Some jobs include automatic increases based on a labor-management or apprenticeship agreement but may not meet the high-quality job standard at first and maybe not for a year or more. The critical emphasis should be on jobs that are likely to lead to high-quality jobs and not only high quality jobs.

Response: We appreciate the comment and note in Goal 4.1 that we state "employers that offer high quality jobs or jobs that are likely to lead to high-quality jobs." We will amend the first sentence of Goal 4.1 to also note prioritization of jobs that lead to high quality jobs.

- The commonwealth will specifically require LWDBs to provide funding to Industry Partnerships and other multi-employer workforce intermediaries that serve employers with common skill needs in their local workforce areas.

Comment: The Commonwealth funding Industry Partnerships and other multi-employer workforce intermediaries should continue to be required and supported. We encourage the Commonwealth to increase funding to support this endeavor.

Response: We appreciate the comment in support of Industry Partnership funding.

- Investments in workforce development programs will be made based on data and return-on-investment analysis.

Comment: Local data needs to be considered when developing a formula for ROI, as well as when analyzing trends.

Response: We appreciate your comment and look forward to receiving stakeholder input as we move forward with the development of this analysis.

- The commonwealth will also work with federal agencies and local boards to ensure that negotiated performance levels reflect the populations being served, particularly with regard to

OSY and other high-risk youth and adults with barriers to employment.

Comment: We support this strategy; the state should actively seek out for opportunities to engage the federal government in conversations that result in standards that consider those with barriers to employment.

Response: We appreciate the comment in support of this strategy.

- The commonwealth will embark on a comprehensive upgrade of the Commonwealth Workforce Development System (CWDS) and JobGateway® to provide for better job seeker and employer experiences and allow staff greater case management and performance accountability functionality within and across core programs. To the degree possible, the commonwealth will also look at ways to integrate CWDS with the case management systems of other partner programs.

Comment: Linking CWDS to existing provider case management systems is an important direction for supporting greater access to and use of data among job seekers, employers and workforce professionals. Within the workforce professionals' category, we recommend highlighting the importance of supporting access to data among both providers directly serving youth, as well as intermediary providers that help to support youth providers in larger markets.

Response: We appreciate the comment in support of this strategy and the recommendation to provide data access to direct and intermediary providers.

- The commonwealth will evaluate available data including how it is presented and released, to ensure that job seekers, employers and workforce development professionals have the information necessary to make informed decisions.

Comment: We are excited to see that data sharing and more effective use of data are a specific goal area in the plan. To strengthen this section, we would suggest that the plan place more emphasis on the importance of implementation data that can support greater understanding of program quality. By emphasizing program implementation metrics, providers and intermediaries have access to information that: can (1) help support program refinements, and also (2) ensure that providers are supporting quality experiences for kids that are more likely to lead to achievement of common measures.

Response: We appreciate the comment and welcome suggestions of implementation metrics that would be beneficial to the system.

- Table of Clusters: This table should include business, financial and insurance services. These are major clusters in many areas (Philadelphia, Chester, Lehigh, 3Rivers, etc.)

Response: The commonwealth's industry clusters include Business Services and Real Estate, Finance & Insurance, both of which are represented on the Table.

- Refining the Commonwealth Workforce Development System (CWDS), the system of record used by the commonwealth to collect participant data and report performance outcomes, to allow for more effective case management for job seekers, employers and agency and partner staff. This will include attempts to integrate CWDS with the case management systems of other partner programs.

Comment: This would be a welcome change as it would allow for sharing information across programs, especially Title II providers and Title I providers as well as OVR, veterans and PHA.

Response: We appreciate the comment in support of our intended approach.

- Integration and alignment of workforce programs designed to serve specific populations and administered by other state agencies (e.g., programs for TANF and SNAP recipients operated by the Department of Human Services) with workforce programs administered by the Department of Labor and Industry.

Comment: L&I has less experience developing programming for the challenges facing the TANF/SNAP populations. In order for this vision to be effectively realized, there must be meaningful information sharing and interagency training.

Response: We appreciate the comment. DHS and L&I are committed to working together to coordinate programs to the benefit of our respective customers.

- Another key aspect of cross-program alignment is well-trained staff. The commonwealth will support improved and more frequent customer service and cross-program staff training to increase staff knowledge and allow for better service delivery.

Comment: The commonwealth should consider how it will develop and pay for this training.

Response: We appreciate the comment. The commonwealth will explore the options to provide training through a variety of delivery methods that are both effective and efficient.

- WIOA Performance Goals for Core Programs

Comment: We recommend that the state consider other high school equivalency tests besides GED as an acceptable credential counting towards performance. Since the measurement periods for the Employment, Retention, and Median Earnings, historical data is unknown the state should make this data available in order to effectively negotiate at the local level.

Both the measureable skills gain and employer effectiveness are unknown and it will be important to figure out how to measure them. We applaud the idea of more realistic goals, to reflect increased services to those with barriers to employment. Especially for youth, we want to allow paystubs as a validation source for employment placement and retention.

Response: We appreciate the first three comments and will provide additional guidance upon finalization of WIOA regulations by the federal government. In terms of the last comment, WIOA requires the use of quarterly wage records for the determination of employment placement and retention.

- Provide advice, ideas and support on the development and implementation of the commonwealth's workforce goals and associated initiatives.

Comment: Recommended additional language: "Comment on commonwealth policy and guidance before it is implemented using local constituents as sources of feedback."

Response: We appreciate the comment and can share it with the State Board for consideration should they wish to amend their by-laws.

- As discussed in the strategic section of the plan, the commonwealth will establish minimum requirements for PA CareerLink® career services orientation, minimum requirements for PA CareerLink® basic career services customer flow, a customizable initial intake/assessment/triage form, and a customizable template for developing Individual Employment Plans. The state also held statewide meetings to discuss operation of the PA CareerLink® centers and has arrived at processes for providing and aligning services including Perkins postsecondary partners and additional workforce programs. This will ensure a level of consistency across regions and support alignment of services across programs by reducing duplicate data collections and allowing partners to all work from the same basic customer information. This is an issue that we will need to monitor closely and adjust our service delivery model accordingly.

Comment: It will be important that customer information be full enough to evaluate any intervening factors that lead to success or stumble for customers in multiple systems. This

should also help with co-enrollment and coordination across WIOA Titles and other workforce programs for people with barriers.

Response: We appreciate the comment and will take it under consideration in developing the requirements and forms referenced.

- Applicants for Title II funds will be required to describe how they will align services with the local workforce development plan. To support the commonwealth's goal of increasing opportunities for youth, funded programs will be encouraged to co-enroll out of school youth by providing basic skills instruction. Funded programs will provide integrated education and training whenever possible and appropriate.

Furthermore, the commonwealth will develop policy and guidance governing the use of Title I training funds and other funding sources to support the costs of the workforce training component of integrated education and training opportunities, including both pre- employment and incumbent worker training.

Comment: Aligning Title I and Title II funds are important, however, the commonwealth should offer ample flexibility for local differences in writing guidance and/or policy.

Response: Guidance and policy will be written to allow for flexibility to meet local needs while addressing the requirements of the law and federal regulations.

- An interagency work group has been established and meets on a regular basis to consider ideas, discuss agency initiatives and goals and how partner agencies can help in achieving them, and share best practices. Additionally, DHS, DCED and the Department of Agriculture have recently added Special Assistants focused on workforce development initiatives, all of whom participate in the interagency work group and help in facilitating alignment of activities.

Comment: The addition of Special Assistants focused on workforce development to DHS, DCED and the Dept. of Agriculture is appropriate. It would be useful to include language that will explain the operationalization of the interagency workgroup and how the LWDBs will inform and interact with this group.

Response: We appreciate the comment in support of the addition of Special Assistants. The interagency workgroup will interact with LWDBs on an as needed basis.

- PDE will partner with the DOC to improve coordination of resources and systems at the state level, including providing professional development for Bureau of Correction Education (BCE) staff on key issues such as career pathways, rigorous academic standards, and the development

of college- and career-ready skills.

Comment: This is an important strategy that would improve placement prospects for those with criminal backgrounds.

Response: We appreciate the comment in support of this strategy.

- The Pennsylvania Workforce Data Quality Initiative (PA-WDQI) is an integrated data platform that links human service, workforce and wage record data to measure the outcomes of workforce development programs and identifies the supply of skilled workers in relation to employer demand.

Comment: Local areas need a commitment to access as well – not just state level agencies.

Response: The commonwealth must ensure the integrity and security of data among all partners and programs. As the volume and diversity of workforce data grows, so too do the opportunities and challenges of sharing information among all involved. We are committed to expanding access within the parameters outlined by statutes, regulations, and policies that govern the release of this data.

- Trained and informed staff is another critical element to providing comprehensive, high-quality service. An expanded curriculum of standardized courses, technical courses, conferences and workshops enhance knowledge, skills and the professional development of workforce professionals in PA CareerLink® centers, LWDBs and partnering agencies and promote a collaborative and consistent service delivery through information exchange and learning.

Comment: This strategy would be more effective if the state offered a measurable level of implementation (i.e., 2 trainings available to all local areas per year).

Response: We appreciate the comment and will take it under consideration.

- The commonwealth also recognizes the need to provide supportive services to customers, particularly those with barriers to employment, in order to promote successful outcomes. While many of these supportive services can be provided by the core programs, other services must be secured through partner programs and community and faith-based organizations.

Comment: The commonwealth must make sufficient funding available across all programs to have a good outcome from leveraging programs. Otherwise we just serve fewer and fewer residents in order to meet minimum standards as defined above.

The provision of supportive services to individuals with barriers to employment makes sense. It

is encouraged that the commonwealth provide increased funding to support this initiative. Volunteers from faith-based communities can also be recruited as mentors.

Response: We appreciate the comment and will continue to seek ways to access and leverage funding for supportive services.

- BSTs will communicate and collaborate with other agencies of state government which may have direct liaison activities with employers and regional economic development partners to avoid business fatigue from multiple contacts and ensure coordination of services. This will also include coordination and connection with school districts, career and technical centers and post-secondary providers who can serve as a source of talent for employers.

Comment: This topic should also acknowledge the important convening role of local boards at the local level.

Response: We agree that local boards play an important convening role at the local level. This information will be captured in regional and local WIOA plans.

- The Pennsylvania Department of Education's secondary and postsecondary career and technical education (CTE) programs will collaborate and partner with employers who will assist in: informing and developing career pathways for targeted HPOs; developing work-based learning opportunities for CTE students and career exploration activities for middle school students; developing pathways to high value industry certificates and credentials; developing a system of micro-credentials; and improving STEM focused career exploration.

Comment: We applaud the recognition of career exploration activities for youth. We recommend that performance measures also recognize the value of these activities and that ample time is given to programs to implement these activities.

Response: We appreciate the comments in support of career exploration activities for youth and the suggestion that performance measures be implemented to recognize the value of these activities. Career exploration activities are not appropriate for WIOA performance measures since most students participating in such activities are outside of WIOA's targeted populations. Performance measures under Perkins for career exploration activities will be adopted as appropriate.

- The core programs will work with the education system to support and develop career pathways identified by employers and the workforce system. The commonwealth is partnering with seven community colleges to develop micro-credentials that demonstrate measurable skill gains and are part of a clearly defined career pathway for individuals with barriers to employment through

a Workforce Innovation Fund (WIF) grant.

Comment: Micro-credentials are essential for youth gaining stackable credentials. We applaud this inclusion and encourage the state to use micro-credentials to count towards performance measures. Tying them exclusively to defined career pathways, especially for individuals with the most barriers seems unnecessarily limiting.

Response: We appreciate the comment in support of micro-credentials. The approved grant calls for micro-credentials to be tied to career pathways. We will consider the comment in any future micro-credential efforts.

- Additionally a number of LWDBs are considering the use of Executive Pulse to aid in coordinating business engagement between workforce and economic development partners on the regional and state level; the commonwealth encourages this coordination.

Comment: We appreciate the coordination that the commonwealth encourages as it will be helpful to access this CRM at a reduced licensing cost.

Response: We appreciate the comment in support of this effort.

- The commonwealth, LWDBs, and PA CareerLink® centers shall provide priority for Title I individualized career services and training services...

Comment: This language should clarify that this applies only to Title I Adult services and not dislocated worker services.

Response: We have revised the plan to clarify that priority does not apply to Dislocated Worker services.

- “Individual who is basic skills deficient” means an individual who is:
 - (i) a youth who has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test

Comment: Because of the priority of service application, this should specify the age group for youth as 15 or 16 years or older; a 14 year old might still be in 8th grade.

Response: We appreciate the comment and understand the point that a 14 year old youth may still be in 8th grade and thus reading at an 8th grade level would not indicate basic skills deficiency, but note that the definition mirrors the definition in WIOA.

- In their local plans, LWDBs and PA CareerLink® centers will be required to state the additional methods by which they will apply the WIOA priority of service requirements and the commonwealth's policy regarding priority of service.

Comment: We will have to develop new procedures and a means of tracking for reporting purposes. Adherence to this must also now be a part of future contracts. Operationally, at the center level, it may also be difficult to implement priority of service on the spot for workshops, career fairs, etc. We find this to be true, particularly for group events.

Response: We appreciate the comment and will take it under advisement. We will also look for ways to provide technical assistance to help implement priority of service requirements.

- LWDBs and PA CareerLink® centers will be required to use between 5 percent and 10 percent of their funds to provide transitional jobs, as permitted under Section 134(d)(5) of WIOA, and ensure that priority of service for transitional jobs is afforded to individuals who qualify for priority of service.

Comment: The state should offer more flexibility. Each WDB should be able to determine whether and how much funding to dedicate to transitional jobs programs vs. other interventions for Priority of Service groups as transitional jobs under WIOA are an optional program component.

Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs.

- The commonwealth plans to use a portion of Governor's set-aside funds to support the creation of an Office of Apprenticeship (OAT) with the goal of promoting and growing Registered Apprenticeship (RA) and pre-apprenticeship programs across the state. The OAT is described in greater detail in the response to how the state will incorporate RA into its strategies and services.

Comment: We applaud the state's decision to use some of the Governor's set-aside money to support apprenticeship and pre-apprenticeship programs (particularly non-traditional apprenticeships) and to support services for out of school youth.

Response: We appreciate the comment in support of our approach.

- In cases of individuals with significant barriers to employment, the commonwealth will support OJT, customized training and transitional jobs in quality entry-level positions that provide the

work experience necessary to lead to employment in HPOs.

Comment: This is critical if work experience is to provide the resource for those who are further from entry level employment in a career pathway.

Response: We appreciate the comment in support of our approach.

- All registered apprenticeship programs are required to provide the following information to the Department as part of their procedures for inclusion on the statewide eligible training provider list:
 - Occupations included within the registered apprenticeship program;
 - The name and address of the registered apprenticeship program sponsor;
 - The name and address of the related technical instruction provider, and the location of instruction if different from the program sponsor's address;
 - The method and length of instruction; and
 - The number of active apprentices.

Comment: Because this requires additional reporting, there should be a standardized process/forms.

Response: Thank you for your input. As the Apprenticeship program is integrated into the Eligible Training Providers list and the CWDS system, updates will be provided to the field on the process to apply/renew/report on this new requirement.

- Considering the tailoring of strategies for young adults by age group, 18-21 and 22-24... An emphasis on available work experiences and employment services, rather than education and basic skill building, is preferred for this older group.

Comment: The emphasis on available work experiences and employment services rather than education and basic skill building is contrary to methods that we have employed. We seek to engage youth of all ages by emphasizing and prioritizing education that is connected to work experiences.

Furthermore, these ages are quite close. The assumption that all 21 year olds should be prioritized toward education and all 22 year olds would be better with work experience just isn't reality. Some 18 year olds need work experience and many 22 year olds still need the focus on education.

Response: We appreciate the comment and note that the emphasis is encouraged, not mandated. Local providers should certainly provide services that best meet the needs of the individual customer.

- If a participant disengages from the program at any point, calls, texts, visits and messages on social media are ways to find out why the participant is no longer engaged and let the participant know that he or she can return whenever he or she is ready. Engage adult mentors along with case managers. Such mentors can play a key role in keeping participants engaged with the program.

Comment: The commonwealth should create a clear definition of what qualifies as sufficient outreach. This change may be problematic and evolve into the same challenges as the EARN program currently faces.

Response: We appreciate the comment and will take it under advisement as policies are developed.

- An applicant will become eligible for youth services by providing a statement that addresses the required element that may make the applicant eligible to receive services as an out-of-school youth, signing and dating a form acknowledging this status, followed by verification conducted by workforce staff that such information meets WIOA eligibility criteria for out-of-school youth. The key elements for self-attestation are: the participant identifying his or her status for permitted elements and signing and dating a form attesting to this self-identification. The commonwealth will work with LWDBs to develop additional self-attestation policies and procedures that are consistent with the commonwealth's self-attestation policy.

Comment: This clarity is helpful and provides stronger guidance.

Response: We appreciate the comment that this clarity is helpful.

- Local areas are strongly encouraged to employ single-year provider contracts with the inclusion of a renewal option for additional years, rather than multi-year contracts.

Comment: One year contracts can make it difficult to determine consistency in staffing, etc.

Response: We appreciate the comment and note that we are merely encouraging single-year contracts, not requiring them.

- Due to the uniqueness of Pennsylvania's 23 local areas and the varying levels of resources available, local workforce development boards will establish a definition, along with eligibility documentation requirements, for the "requires additional assistance to complete an education program or to secure and hold employment" criterion. This policy will be developed by each local board and will be required to be submitted to the commonwealth as a component of the WIOA Local Plan.

Comment: This offers a very short time period for local areas to finalize a local policy approved by the board.

Response: We appreciate the comment but feel, particularly with the extension provided for submitting local plans, that this requirement is feasible.

- To assist the local boards with this task, the commonwealth will convene panels of local representatives to develop recommendations on definitions and interpretations of the term “requires additional assistance to complete an education program or to secure and hold employment.”

Comment: More guidance is better for these definitions.

Response: We appreciate the comment.

- Every PA CareerLink® center in Pennsylvania has an employee, who may have other duties, designated as the “Agricultural Specialist.”

Comment: For Philadelphia, sharing a regional representative makes more sense as the need is not as present.

Response: Please note that, according to the plan, the Agricultural Specialist may have other duties. These “Agricultural Specialists” are used for specific agricultural purposes and used only as needed. There is no duplication or redundancy of services, and therefore there is no additional incurred or inefficient use of training resources. One duty of the “Agricultural Specialist” is to write H-2A job orders into the system and to manage those orders. These orders are specific to that location, and for that reason each PA CareerLink® in Philadelphia needs its own individual designated as an Agricultural Specialist.

- As part of the application process, applicants will be required to submit their applications to the LWDB, which will review the applications for alignment with the local plan. PDE will provide opportunity to the local boards to provide recommendations and will take the recommendations and results of the review into consideration when scoring the related sections of the applications.

Comment: Local boards may not meet in a way to easily approve or recommend providers. Perhaps a committee of board and other stakeholders could make the recommendation.

Response: Section 108 (d) of WIOA states that one of the functions of the LWDB is to review applications for Title II funds to determine alignment with the local plan and to make recommendations to promote alignment. The local board is free to appoint a subcommittee or

stakeholder group to advise it on scoring applications but the full board must make the final decisions.

- The commonwealth will develop policy and guidance further clarifying allowable and required activities in an integrated education and training program. In addition, the commonwealth will research funding opportunities to cover the costs of the occupational training whenever possible.

Comment: We support this as it would help expand the system.

Response: We appreciate the comment in support of these intended actions.

- Applicants will also need to provide evidence of communication with and input from the LWDB and local businesses/employers in identifying the occupational training opportunities to be included in the integrated education and training portion of the program.

Comment: We support coordination between Title II and WDBs.

Response: We appreciate the comment in support of this coordination.

- Applicants will also need to provide evidence of communication with and input from the LWDB and local businesses/employers in identifying the occupational training opportunities to be included in the integrated education and training portion of the program.

Comment: We support coordination between Title II and WDBs.

Response: The commonwealth will investigate a variety of models when establishing priorities for this activity.

- Further, the Division of Adult Education will apply an additional performance measure: the number of outcomes achieved per student;

Comment: On its face, this measure looks to be a good way to see if students are achieving multiple outcomes (skill and credential enhancement) as well as employment.

Response: We appreciate the comment in support of this measure.

- OVR is optimistic that this program has the potential for statewide replication. Pennsylvania has 67 counties, 15 OVR District Offices, and 85 Career & Technology Centers.

Comment: We support the replication of Berks County's school-to-work transition program for CTE students with disabilities. Also SAP in Chester County hires autistic youth (18 and older) to learn programming. It is important that students with disabilities get access to work and pipeline development opportunities.

Response: We appreciate the comment in support of replication of this model.

- Enhance collaborative relationships with DHS, PDE and higher education.

Comment: Although the law requires that all those with IEPs or Section 504 agreements have to begin getting transition services at 14, almost no local areas are compliant. Thus young people with disabilities are not prepared for post-secondary education or the workforce.

Response: We appreciate the comment. Updates in the Rehabilitation Act of 1973 as amended in the Workforce Innovation and Opportunities Act of 2014 prioritize "Pre-Employment Transition Services" for students with disabilities ages 14 -21. OVR has expanded its service definitions to include "Pre-Employment Transition Services".

- Individuals will be able to access WIOA services such as training programs aligned with a career pathway, an On-The-Job training program or a Transitional Job Program. Individuals with multiple barriers to employment are a priority under WIOA. This priority status will help individuals access the training services they may need to be employed.

Comment: If funding for transitional jobs is to come out of the WIOA/CL contracts, it seems to demand that those transitional jobs be jobs in the CL to help mitigate the staffing shortage we already face.

Response: If local PA CareerLink® centers are able to coordinate a Transitional Jobs program, that would be a great opportunity for individuals to be exposed to the world of work. The strategy for the implementation of a Transitional Jobs program will be a Local Workforce Development Board decision.

- The PA CareerLink® centers will also help individuals participate in job fairs and other employer recruiting events. Individuals with multiple barriers will receive priority of service designation so training services can be readily available.

Comment: Again, individuals with multiple barriers can be prioritized but they still won't qualify for existing training opportunities.

Response: We appreciate the comment and encourage Local Workforce Development Boards to develop training programs for all job seekers in need of additional skills to secure employment.

We are unclear why individuals with multiple barriers will not qualify for existing training opportunities.

- Generally speaking, the AAAs and the nine National SCSEP sponsors are involved with the PA CareerLink® centers in the following ways: refer all individuals ages 55 and older to the PA CareerLink® centers to enroll in the Commonwealth Workforce Development System (CWDS); PA CareerLink® staff refer SCSEP eligible individuals ages 55 and older to the AAAs and the nine National SCSEP sponsors for services; co-enroll eligible individuals in WIOA, OVR, and Veterans programs to more efficiently use federal and state workforce development funds; co-locate SCSEP staff at the PA CareerLink® centers on a full- or part-time basis; and co-locate SCSEP participants at the PA CareerLink® centers to serve as greeters, resource room aides, job developers, custodians, clerical aides, and customer service representatives. The SCSEP is represented on all 22 Local Workforce Development Boards in the commonwealth by AAA directors, AAA SCSEP staff, national SCSEP operators, and county human service agency directors.

Comment: This is always good for all concerned.

Response: We appreciate the positive comment.

- The DOC proposes a collaborative partnership with the State Department of Labor & Industry via an REO workgroup. This coordination on DOL Reentry grants would be positive, but L&I should include local WDBs in the workgroup or through consultation. The REO grantee in Philadelphia currently is Connection Training Services. We usually receive 2 or 3 requests for letters of support for REO grant proposals annually.

Response: We will consider inclusion of LWDBs in the workgroup.

- Competitive grants to multiple Industry Partnerships in a specific cluster (e.g., advanced manufacturing, health care, logistics and transportation) that agree jointly to develop and use sector-specific benchmarking tools that track the impacts of strategic workforce investments on employer outcomes. (Outcomes might include turnover in long-term care, scrap rates and uptime in manufacturing, and on-time delivery in logistics and transportation.) These tools would be another way to encourage sector partnerships to tackle higher-order organizational improvement issues with a potential to increase the return on investment.

Comment: Employers may find these invasive and stop participating. The goal is to help employers engage.

Response: We appreciate the comment and note that application for these funds would be voluntary.

- Develop a certification process for Sector Partnerships. Businesses often use organizational certifications, such as ISO standards, as tools for improving organizational performance. Workforce intermediaries could similarly benefit from a certification process. Certification might be particularly valuable to improve partnership governance, e.g., by making partnerships more employer-driven and less staff-dependent. Certifying partnerships would also open up the possibility of using certification as the basis for eligibility for partnerships to qualify for additional or continued state funding.

Comment: This provision aligns with current sector strategies.

Response: We appreciate this comment.

Judith Creed Homes for Adult Independence, Inc. submitted the following comments:

Judith Creed Homes for Adult Independence, Inc. (JCHAI), a Pennsylvania provider of independent living services for adults with intellectual disabilities and autism and RespectAbility, a national nonprofit focused on best practices on WIOA, respectfully submit these comments on the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan. Governor Wolf and the taskforce that has created this plan have clearly studied the issues surrounding workforce barriers for people with disabilities and done an admirable job in creating a vision and plan for helping to surmount these barriers. Our group offers these suggestions to help make Pennsylvania a leader in employment for those with disabilities. We were heartened to see the Commonwealth's commitment to Employment First principles. Competitive, integrated employment for people with disabilities is an essential goal for Pennsylvania. When looking at the numbers of people in Pennsylvania with a disability, their employment rates, and their dependence on entitlement programs, it is easy to see why your work is so important. This chart lays out statistics that lead to the inescapable conclusion that expanding job opportunities for people with disabilities is a win-win-win for employers, taxpayers and people with disabilities alike. It is good for employers because the loyalty, talent, and skills of workers with disabilities contribute to the employers' bottom line. It is good for the workforce system because improving services and supports for job seeker with disabilities will benefit others with different barriers to employment. It is good for people with disabilities who want the dignity, pride, friendships, independence and income that work provides.

The Plan from does well in focusing on certain key elements for improving employment for people with disabilities:

- Beginning training for people with disabilities at an early age, focusing on ages 14 and older (see, e.g., pp. 108 et seq.).
- Including people with disabilities on Citizen Advisory Committees (p. 110)
- Setting the tone for employment of people with disabilities in government agencies (p. 112)
- Focusing on Industry Partnerships and Sector Strategies (Appendix XIV).

- Including the Labor Force Participation Rates of people with disabilities in the “summary of Pennsylvania’s labor force for 2014” (p. 22)

However, Pennsylvania has a lot to accomplish to improve our ranking in the country for employment of people with disabilities. Pennsylvania ranks 30th in the percent of people with disabilities employed (and these statistics include those employed in sheltered workshops and/or only working part time) (See Civilians with Disabilities Ages 18 to 64 Years Living in the Community for the United States and States: 2013 from the Annual Disability Statistics Compendium). Pennsylvania ranks 34th by the employment gap between people with disabilities employed versus people without disabilities employed. See id; see also <http://disabilitycompendium.org/archives/2014-compendium-statistics/employment>

Response: We appreciate the support of Employment First principles. We also appreciate the comments in support of key elements of the plan. The commonwealth shares the commenter’s goal of increasing the number of persons with disabilities employed. PDE will collaborate with OVR to develop a training strategy to help IEP teams in school districts incorporate Employment First principles into work, education and transition plans for people with disabilities ages 14 and older.

- Consider and Outline More Specifically the Types of Jobs that Are the Goal for People with Disabilities: Much of the emphasis in this plan is given to High Priority Occupations (HPOs) or entry-level occupations that lead to HPOs. See, e.g., p. 8. Furthermore, the HPOs are considered most desirable because they lead to family-sustaining wages. See, e.g., Section 1, Goal 1, p. 9. For people with disabilities, especially cognitive disabilities, the goal of entry-level employment may be sufficient in some cases. In addition, seeking employment for people with disabilities that will be self-sustaining, but not necessarily family-sustaining, is an important goal, and the emphasis throughout this plan on HPOs and family-sustaining wages makes the goal of competitive, integrated, potentially self-sustaining employment seem less important in the prioritization for this Plan. We would not want funds through this Plan for people with disabilities to be lessened because it might be less likely that they will lead to HPOs and family-sustaining wages. See, e.g., p. 15.

Moreover, in the description of priority of categories for people with disabilities, the priority of categories to receive vocational rehabilitation services is ordered by severity of disability. See pp. 135-37. That the most funds will go to those with the most significant disabilities makes it much less likely that those funds will lead to HPOs and family-sustaining wages. Again, the Plan’s focus on HPOs and family-sustaining wages as the priority could lead to fewer funds being distributed to the types of jobs that are likely to be appropriate for those with disabilities who are likely to be served under this Plan. See Section IV, Vocational Rehabilitation Programs, State Goals and Priorities, Goal ##1-3, pp. 135-36. Indeed, the state of Washington eliminated the use of priority of service and were able to eliminate a wait list of 14,000 people as a result.

Additionally, we suggest another consideration for the approach in the prioritization of those with disabilities who will be served under this Plan: a “Jackie Robinson” approach. As the first African-American to play major league baseball, Robinson tore down decades of discrimination and blazed a trail for other talented and diverse athletes to follow. Instead of focusing all the dollars in the Office of Vocational Rehabilitation (OVR)’s plan on people with the most significant disabilities who may have the biggest barriers to employment and may have the most difficult time overcoming them, focusing a larger share of dollars on people with less significant disabilities and therefore fewer barriers to employment may be more effective in terms of convincing the general public of the efficacy of competitive, integrated employment for people with disabilities. It also may result, as it did in Washington state, in larger numbers of people with disabilities from across the spectrum to achieve the goal of competitive, integrated employment.

Response: We appreciate the comment and note that while HPOs are emphasized, the system ultimately must provide services that best meet the needs of the individual customer. Regarding order of selection, OVR will maintain its current Order of Selection of serving eligible individuals with most significant disability (MSD). Throughout the year OVR senior management will evaluate and monitor the agency's available resources on a regular basis to justify the priority category within the order. Per federal regulations, OVR currently tracks and re-contacts individuals who are found ineligible for OVR services.

- **Monitor Youth with Disabilities by Disability to Better Analyze How to Increase Their Employment Rates:** A significant gap in the Plan data is that it fails to breakdown employment for people with disabilities by the type of disability they have. See, e.g., Section I, Economic Analysis; Section IV, Vocational Rehabilitation Programs, State’s Strategies, pp. 22-23; 145-57. Placing all people with disabilities into the same category to find methods of increasing employment for them will be ineffective. The tables below show examples of how diverse the population of people with disabilities in Pennsylvania is, and the differing impact their disabilities have on their employment potential: So, for instance, while 4.9% of people from the ages of 16-20 have a cognitive disability, by far the most common type of disability among that age group, as they get older, only 22.7% of those between ages 21-64 with a cognitive disability are employed. Therefore, it makes sense to focus efforts in determining how to increase employment among those with the most prevalent type of disability. Early training efforts, such as those mentioned in the plan throughout (see, e.g., pp. 15, 108-9, 115, 136-38), will yield the most results if they are tailored to address the issues for most of those with disabilities.

In fact, Maryland’s WIOA Plan analyzes by region the correlation between people with disabilities and those who had Individualized Education Plans (IEPs). Regionally, the data showed that areas with a strong IEP system and more people who had IEPs in school, later had less dependence on entitlement benefits. In other words, early and strong education and vocational training will result in adults with disabilities who will be able to be more productive members of our community. Our Plan should include data that analyzes this correlation and seeks to ensure

that the Department of Education is well-equipped to provide successful training. See Section II, Operational Planning Elements, Engagement with Educational Institutions and Leveraging Resources to Increase Educational Access, pp. 49-51; Section IV, Program Specific Requirements, Vocational Rehabilitation Programs, Coordination with Education Officials, pp. 116-9.

Response: OVR/PDE/DHS continue to explore options to align data management systems to provide for better analysis of outcomes and the services that promote, or conversely, limit them. The agency partners have been challenged by differing federal reporting requirements, existing "legacy" systems and limited resources; however, we agree that more consistent, accurate data collection and more thorough analysis of that data is necessary to continually assess the services that we provide and the outcomes they generate for individuals with disabilities.

- Ensure the best data points, including Labor Force Participation Rates of people with disabilities, are used as performance metrics: It is vital that the workforce system and the State Board include the labor force participation rates of people with disabilities on their state dashboards and performance metrics. Looking solely at unemployment information, decision makers are missing the bigger picture of those individuals with barriers to employment who are not actively seeking work. As an example of the data that is needed, we are including a link to, and a copy of, the presentation our organization has compiled about employment for Pennsylvanians with disabilities. This compilation contains information derived from the Census Bureau's American Community Survey that should be valuable to the WIOA work.

As mentioned in the opening section of our comments, one of these data points was included in the Combined State Plan. Specifically, the section providing "a summary of Pennsylvania's labor force for 2014 including data for veterans and persons with disabilities," includes the labor force participation rates. It is critical to ensure that these numbers are included in both the state dashboard and elsewhere in the WIOA Combined State Plan.

As stated in the opening sections of our comments, it is also critical to look at the employment gap between Pennsylvanians with and without disabilities. This is a critical metric and it is needed to ensure that barriers to employment are being overcome and positive outcomes are being achieved.

Response: We appreciate the recommendation to include analysis of individuals with disabilities to include labor force participation rates of people with disabilities on the state dashboard and in performance metrics and we plan to do so. We agree that it is important to evaluate the effectiveness of the state's WIOA plan in achieving all stated goals, including increased employment opportunities for individuals with a disability.

- Addressing Transportation Issues Is Critical to Improving Employment Outcomes: The Plan recognizes how critical access to transportation is for improving employment outcomes for Pennsylvanians with barriers to employment. See, e.g., pp. 37, 103, 121, 146-47. But we cannot

emphasize enough that employment outcomes for people with disabilities will not improve unless transportation access is improved.

Paratransit is limited in its scope, the ability to drive or access to a car is limited for many people with disabilities, and walking safely or at a have reliable transportation for work. The Plan must set out a commitment to work with the Department of Transportation and the employers with whom they engage to determine innovative ways to help Pennsylvanians with disabilities have reliable transportation for work. In some case that might be mass transit or Paratransit. In other cases it might be new models with companies such as UBER. Indeed, UBER is also a potential form of self-employment for people with disabilities.

Response: We appreciate the comment and agree how critical access to transportation is for improving employment outcomes for people with barriers to employment, specifically for individuals with disabilities. We will work with PennDOT to address this challenge.

- Focus on Effective and Strategic Employer Engagements, Especially with Federal Contractors Around Section 503: More emphasis is needed in the Plan around the employment opportunities and talent challenges created by the Section 503 regulations of the 1973 Rehabilitation Act and federal contractors. These regulations are only referred to in Section IV, Vocational Rehabilitation Programs, Evaluation and Reports of Progress: OVR and Supported Employment Goals (pp. 151, 155). We are pleased that Pennsylvania has already started to recognize the unprecedented opportunities surrounding the goal for federal contractors to have 7% of their workforce across each segment to be people with disabilities.

However, the Plan ought to address exactly which contractors will be targeted for training and other supports to help them reach this goal. In Pennsylvania, for example, the chart below shows employers who are the top federal contractors falling into the purview of the § 503 regulations: Section I, Goal 4 (p. 15); Section IV, Vocational Rehabilitation Programs, Coordination with Employers (p. 120), Section IV, Vocational Rehabilitation Programs, State's Strategies, p. 140, and Appendix XIV are only a few places where focus should be spent on leveraging the § 503 mandates to achieve our goals.

Response: In the past under 1973 Rehab Act Section 501 and Section 503 Affirmative Action requirements, and currently under the new Section 503 Individuals with Disability (IWD) Workforce Inclusion Rule, OVR has worked closely with the Philadelphia and Pittsburgh PA Regional U.S. Dept. of Labor (DOL) Office of Federal Contract Compliance (OFCCP) Administrators and staff in outreach encounters with new or existing Federal Contractors to insure their full compliance in the recruitment, hiring and retention of qualified individuals with a disability (IWD). The U.S. DOL OFCCP has provided direct referral of businesses to OVR since 2014 that are improving their compliance and outreach of qualified IWD and by providing Internet access of current Pennsylvania federal contractors who must comply with the Section 503 Rule for a goal of 7% IWD workforce participation in their business. We will also work with

the Department of General Services and other state agencies, as relevant, to address this concern.

- **Do Not Leave People with Disabilities Out of STEM Goals:** The Plan acknowledges that one of the largest growth sectors in Pennsylvania is Healthcare See Section I, Economic Analysis, pp. 25, 27. More on that later as this is a key sector. Furthermore, goals of the plan in Section I, Goal 3, acknowledges in paragraph 3.9 that STEM training for out of school youth will be an effective way to increase employment outcomes under the Plan. However, people with disabilities are not discussed as being the target of STEM goals.

Given that many federal contractors as well as healthcare employers will need STEM trained employees, it is clear that many opportunities will exist for people with disabilities in these fields. Not targeting people with disabilities for STEM training opportunities will make them miss out on a large employment opportunity in Pennsylvania.

Partnerships should be created with federal contractors who have 503 requirements and talent shortages. The companies in the above table, as well as Lockheed Martin Corporation, and hospitals throughout the Commonwealth, will be prime candidates for these efforts. Through WIOA, Pennsylvania's workforce system should be leading the nation in terms of helping these dynamic businesses meet and exceed their Section 503 requirements.

At JCHAI, for example, we have begun a training program in building robots for those with intellectual disabilities and autism in our program in conjunction with the FIRST Robotics Competition and Lockheed Martin. Our first class taught rudimentary building skills as well as basic programming to our students. These skills are important to getting jobs in today's economy. People with disabilities should receive the same trainings as others in these fields.

Response: We appreciate the comment. Goal 3.9 is not intended to suggest that persons with disabilities will not be afforded STEM opportunities; it was merely an example of how state resources were being utilized in support of another WIOA target population (out-of-school youth). We applaud the commenter for their work in developing a training program in building robotics for those with intellectual disabilities and autism.

- **Focus on Sector Strategies to Get More People with Disabilities Employed:** The success of WIOA depends on being an employer driven paradigm shift. Expanding opportunities for people with barriers to employment such as disability requires strong partnerships with employers in those sectors which are rapidly expanding.

Section I, Economic Analysis (p. 20 et seq.) contains a detailed analysis of Pennsylvania's economy. The Plan states that "[g]rowth will be greatest in the Construction, Professional & Business Services, and Education & Health Services sectors." See p. 24.

Pennsylvania should (and does: see p. 15) place front and center proven training programs such as Project Search when helping those with disabilities get the training they need to be employed. Project Search has many sites in Pennsylvania that are primarily based in healthcare settings: one of the biggest areas of projected growth in Pennsylvania. JCHAI has successfully partnered with Project Search at its Lankenau site in Wynnewood to train several of our clients in employment skills that have resulted in their being employed long-term. We intend to continue this partnership and with more funding to Project Search, they would be able to expand their offerings into other growth industries in Pennsylvania.

The ARC of Pennsylvania has worked effectively with SAP and Specialisterne to pilot projects to promote the hiring of people with autism in technology fields. This program is a groundbreaking program that used human resource training, mentoring, and the hiring of small cohorts to promote the larger goal in ways that are being replicated throughout the country. See, e.g., <http://www.forbes.com/sites/robertszczerba/2016/01/19/this-visionary-may-completely-disrupt-the-tech-industry-as-we-know-it/#550e9200890e>. The program in the last year has been expanded to Towers Watson in Philadelphia as part of the Philadelphia Pilot Project. <http://www.paautism.org/phillyautismproject/Resources/Resource-Details/itemid/6103> Examples of these partnerships should be included in the Plan as well. See Section IV, Vocational Rehabilitation Programs, Coordination with Employers, pp. 120-21.

As has been documented in many cases, there can be an “Autism Advantage” in the STEM space. Indeed, some people on the autism spectrum can have the very best skills in science, math and engineering. Microsoft, SAP, and Specialisterne have committed themselves to “provide employment opportunities for people on the autism spectrum in roles such as software testers, programmers, system administrators, and data quality assurance specialists.” The Israeli Defense Forces recruits and trains their citizens on the Autism spectrum for work in their elite intelligence unit. Delaware’s Governor Jack Markell is partnering with companies to employ more people on the autism spectrum in STEM jobs. Such examples need to be implemented by Pennsylvania as well. This issue of STEM and access for student with disabilities is a natural point of partnership between the workforce system and the educational system. That work needs to start young, be matched with high expectations for success, and designed to ensure people with disabilities have the chance to become scientists, engineers, doctors and mathematicians.

Response: We appreciate the comment in support of replication of the model.

- Effective Employer Engagement Includes Involvement by the PABL: Our hope to see improving employment outcomes in Pennsylvania very much depends on being an employer-driven paradigm shift. Fundamentally, this law is about spurring innovation and expanding opportunity. There will be no outcomes in terms of employment for Pennsylvanians with disabilities without early, often, systematic, and aggressive business engagement.

Clearly, the Plan recognizes the importance of employer engagement. Throughout the Plan, sections reference the importance of employer involvement in developing pipelines of jobs. See, e.g., Section II, Coordination, Alignment and Provision of Services to Employers, pp. 49-50; Section IV, Vocational Rehabilitation Programs, Coordination with Employers, pp. 120-21.

Disturbingly, however, there are no references to one of the great resources in Pennsylvania, the Pennsylvania Business Leadership Network. In response to the business community's needs for a diverse set of qualified workers to fill its labor needs, meet its compliance requirements, and respond effectively to the needs of its diverse customers, AHEDD began coordinating a statewide business initiative, The Pennsylvania Business Leadership Network (PA BLN) in 2000. The PA BLN is part of a national initiative that began in 1994 and that includes approximately 50 BLN affiliates throughout the country. The national effort is now led by the USBLN (<http://usbln.org>), which has the support of a number of corporate partners. The PA BLN has piloted groundbreaking partnerships with Pennsylvania businesses, including Hershey Resorts and Highmark, Inc. Pennsylvania must utilize the depth of experience and knowledge that PA BLN has in onboarding Pennsylvania employers to the benefits and ease of increasing their disability diversity hiring practices.

Response: We accept the comment and will make a change to page 139 to include mention of the Pennsylvania Business Leadership Network.

- Busting Stigmas, Myths, and Misconceptions should be a key part of Pennsylvania's overall workforce strategy: Low expectations and misconceptions are critical barriers to employment for people with disabilities. A Princeton study shows that while people with disabilities are seen as warm, they are not seen as competent. Similarly, a study published by Cornell Hospitality Quarterly found that companies share a concern that people with disabilities cannot adequately do the work required of their employees. We therefore recommend that the Pennsylvania's Combined State Plan be amended to include a comprehensive proactive communications/public relations strategy for reducing such stigmas. Indeed, we know that other groups of Pennsylvanians with barriers to work also face stigmas, especially those leaving the corrections system. See, e.g., Section IV, Vocational Rehabilitation, State's Strategies, Goal #1: Increase Employment Opportunities for People with Disabilities, pp. 145-46 (could be added as #4 step for Goal #1).

The PA BLN has proven experience in successfully handling exactly these types of sensitive matters. They should be specifically referenced as a partner in achieving employment goals for Pennsylvanians with disabilities (pp. 120-21), even if utilizing them may not be in furtherance of the Single Point of Contact approach (p. 140). We are a large Commonwealth, with diverse employers and regions, and the Single Point of Contact approach may need to be modified to reach effectively the varied types of locations of employers in Pennsylvania.

While the approach needs to be adaptive, previous research and focus groups show that there

are three types of messages and audiences that are needed to expand employment for people with disabilities. Serious communications campaigns are needed for all three:

- CEOs/business leaders need to understand the value proposition/business case for their specific company as to why they should focus on putting people with disabilities into their talent pipelines. This is best done through business-to-business success stories. Hershey, Jefferson Hospital http://articles.philly.com/2014-11-29/news/56543664_1_speech-language-pathologist-disability-bosses), Giant Eagle, and other Pennsylvania employers have seen that people with disabilities can be extremely capable and loyal workers. While there are few like Stephen Hawking — with or without disabilities — people with disabilities can work highly successfully in hotels, healthcare, tend our parks and facilities, assist aging seniors, and be super talents in developing computer software and engineering solutions. CEOs and business leaders need to know that people with disabilities can be the BEST people to get a job done.
- Human resources professionals and on-the-ground supervisors need to understand that hiring people with disabilities is generally easy and inexpensive, and that any costs incurred are more than offset from increased loyalty. Hiring managers and supervisors are key implementers who can turn high minded policy and business goals into action at the ground level. However, studies show that many of them are afraid of what they do not know about people with disabilities. They are afraid of potential legal action, costs, or other failures. For them, they need supports that will empower to overcome their own fears and to excel at recruiting, hiring, supervising or working with teammates with disabilities. Pennsylvania's OVR staff and community agencies can fully support human resources professionals and managers in dealing with their own specific fears and stigmas surrounding hiring people with disabilities. Moreover, online and in-person training is readily available to help from a variety of sources. RespectAbility has online webinars, as does ASKJAN.org, USDOL and others. Partners like the Poses Family Foundation Workplace Initiative can provide training to the workforce staff and volunteers systems-wide as well as to community agencies in supporting companies through messaging efforts around related to fear and stigma. The National Organization on Disability and the interested leadership of Former Governor Tom Ridge offer incredible resources and a powerful voice.
- People with disabilities and their families need high expectations. From the time of diagnosis, education for high expectations must begin. It is vital to have Pennsylvania's "Employment First" Policy supported by a PR campaign that will inspire Pennsylvanians with disabilities to reach for the stars. For example, Virgin Airways founder Sir Richard Branson and finance wizard Charles Schwab are dyslexic. Scientist Stephen Hawking and multi-billionaire businessman Sheldon Adelson, like Gov. Greg Abbott of Texas and President Franklin D. Roosevelt before them, are wheelchair/mobility device users. The CEO of Wynn Casinos, Steve Wynn, is legally blind. Arthur Young, co-founder of the giant

EY (formerly Ernst & Young) was deaf. Success sells success and that is something the workforce system should seriously utilize in an intentional manner moving forward.

Response: We agree and will make mention of PA BLN has a key partner on page 139 of the State Plan. We also appreciate the comments suggesting groups to focus communications campaigns on.

- **Ensure That All Programming Is Fully Accessible:** In several places throughout the Plan, various web-based outreach services are described as well as One-Stop Centers. See, e.g., Section III, Assessment of Programs and One-Stop Partners, pp. 57-59, Non-Discrimination and Accessibility, pp. 70-71, Section IV, Vocational Rehabilitation Programs, State's Strategies, Goal #3: Increase community education and outreach, pp. 148-49. While physical accessibility is important and all physical locations should be fully accessible, ensuring that the workforce system is programmatically accessible will have a broader impact. As such, questions around closed captioning of training videos, website access for screen readers, and the availability of assistive technology for job seekers with disabilities are critical topics in need of close attention. There are signs that the collaboration needed to support assistive technology already exist. For example, on page 46, discuss how OVR in Pennsylvania collaborates with BWPO via PA CareerLink® centers to better assist veterans who have disabilities in obtaining assistive technology (AT) to remove barriers in locating and maintaining employment." Further, page 71 of the Plan commits to a collaboration with the independent living movement to "evaluate the physical accessibility and information technology accessibility of all PA CareerLink® offices and services." To do this well, it will be vital to be proactive, thoughtful, and use such a review as a chance to think about accessibility more deeply.

Response: We appreciate the comment and note that the commonwealth mandates that all the PA CareerLink® centers provide reasonable accommodations, including programmatic accessibility. We will look for ways to continue to improve programmatic accessibility as suggested.

- **The Plan Appears to Target Efforts for People with Disabilities Solely Through OVR, Without Considering that Those with Disabilities Fall into Almost Every Other Group Addressed in the Plan:** The Plan addresses boosting employment for what it appears to consider as distinct groups: Section I, Goal 3 seeks to "Increase Work-Based Learning Opportunities for Youth." See pp. 12-15. Although initiative 3.12 specifically addresses youth with disabilities, all the initiatives named in this section could be used for people with disabilities.

This same segregation of people with disabilities out of categories that apply to them as well occurs in considering programs for veterans, corrections education, and adult education. See pp. 67, 103, 229. Recognizing that goals may be achieved for people with disabilities across many programs will be essential to increasing employment opportunities for more people with disabilities.

Response: We appreciate the comment and note that all programs serve individuals with disabilities assuming they otherwise meet program eligibility requirements.

- Facilitate Innovation in Vocational Services by Not Limiting Them to OVR Agencies or Particular Kinds of Credentialing: The primary focus of the programs for people with disabilities under the Plan is through the Office of Vocational Rehabilitation. Section IV, Vocational Rehabilitation Programs (pp. 108-157). Although clearly the OVR has a great deal of experience in assisting Pennsylvanians with disabilities in finding and maintaining employment, other parts of the state government as well as other service providers have experience doing so. See, e.g., pp. 119, 120. To limit the development of innovative programming to change the employment landscape for people with disabilities to agencies that are already OVR contractors would be short-sighted.

Many providers work through the Department of Human Services to provide complementary services for people with disabilities and as a result, have experience in developing programming for gaining competitive, integrated employment for people with disabilities. Indeed, because the concept of Employment First is new in Pennsylvania, it may be that providers who are not already OVR contractors could have more ability to help increase competitive, integrated employment opportunities for Pennsylvanians with disabilities. Having onerous certification procedures could also be barriers to newer agencies becoming involved in our reaching our employment goals for Pennsylvania.

For example, at JCHAI, we have a 70% competitive, integrated employment rate for those of our clients who are interested in employment. We have been able to attain this rate because our staff uses varied approaches to helping our clients find and maintain their employment. However, our agency is not a contractor with OVR, but with the Office of Developmental Programs (ODP). Working hand in hand with other governmental agencies and private providers with relevant experience will help improve the chances of achieving higher rates of employment for Pennsylvanians with disabilities, while still ensuring quality provider involvement.

Furthermore, OVR's focus on particular credentials for those working to improve employment outcomes could be limiting and not necessarily promoting the most current techniques in vocational rehabilitation. The OVR Counselors, for example, must have a Master's Degree in Rehabilitation Counseling, Rehabilitation Administration, or Rehabilitation Education; or Certified Rehabilitation Counselor credentialing. See p. 126-27. There are other forms of training, including Discovery and Customized Employment trainings, that would be more current to promote Employment First principles, and do not necessarily require the credentials called for in the Plan. Again, flexibility is key to promoting the innovation that is the hallmark of WIOA.

Response: PDE will collaborate with OVR to develop a training strategy to help IEP teams in school districts incorporate Employment First principles into work, education and transition plans for youth with disabilities.

- Finding Market Niches with High Turnover Jobs: Millions of dollars are lost each year due to employee turnover. For all jobs earning less than \$50,000 per year, the average cost of replacing one employee is between \$6,000 and \$20,000. Research shows that employees with disabilities are more productive and loyal than their non-disabled peers. Company records show that even when the relatively more expensive accommodations were factored in, the overall costs of accommodations were far outweighed by the low turnover rates and better tenures of the employees with disabilities. Hospitals, elder care institutions, hotels, and distribution/supply chains including UPS, Walmart, and Walgreens have proven records of success. They can be outstanding partners for disability employment as these industries suffer from high turnover rates and employees with disabilities are proven to have significantly higher retention rates. It is important to identify more specific opportunities with employers and to site them inside the plan, as well as the criteria by which to continue and to expand such partnerships in the future.

- Health and Elder Care – Challenges and Opportunities for People with disabilities

Page 20 of Pennsylvania's Combined State Plan, provides an overview of "Current State of the Pennsylvania Labor Market." This section discusses in detail the challenge created by an aging population. "Simply stated, Pennsylvania's population is growing older. The number of Pennsylvanians age 65 and over was 2.1 million in 2014. The state's percentage of those aged 65 and over is the sixth highest in the nation (16.7 percent)."

This fact of an aging population creates both a challenge and an opportunity for Pennsylvania. As Baby Boomers age, the demand for healthcare will grow and with it, the talent needs of assisted living and elder care facilities. Training and preparing workers to meet those needs is a challenge, but one with a ready solution. We submit that people with disabilities are a natural labor resource that can be trained and prepared to meet this need. There are numerous examples of young people with disabilities doing incredible work in the fields of healthcare, elderly care, and in assisted living. This is where the opportunity a serious, sustained expansion of Project SEARCH and other school to work transition programs can be beneficial to Pennsylvania's economy and population. This is a natural opportunity that demands quick action and an investment in cost-effective programs.

Nationally, Project Search sites overall have been achieving outstanding results for people with disabilities, employers, and taxpayers alike. For example, the first longitudinal study of the program found "a 68% success rate in transitioning students from high school into competitive employment" and "Project SEARCH sites in Upstate New York that have an impressive 83% success rate overall." The goal for each program participant is competitive employment.

- Logistics and Distribution Centers – Natural fit for people with differences.
Another sector with high turnover and big potential are distribution/supply chains.

Many companies, including UPS, Wal-Mart, and OfficeMax have proven records of success. Walgreens has demonstrated that workers with disabilities in their distribution centers are as productive, safer, and turn over less when compared to peers without disabilities. These efforts have taken the logistics sector by storm with Lowe's, OfficeMax, Pepsi, as well as P&G all launching their own successful disability hiring initiatives. For example, as reported by the National Organization on Disability, "Lowe's hired more than 150 new workers with disabilities in the first year, and an additional 250 workers in the following 18-month period." They can be outstanding partners for disability employment as these industries suffer from high turnover rates and PwDs are proven to have significantly higher retention rates. It is important to identify more specific opportunities with employers and to cite them inside the plan, as well as the criteria by which to continue and to expand such partnerships in the future. Another great example is Starbucks. Their "Inclusion Academy" has rapidly grown from just a pilot program in Carson Valley, NJ to a complete program at their largest roasting plant.

- Ensure that Apprenticeship Programs are Fully Accessible and Actively Recruiting Young People with Disabilities

Registered apprenticeships, on-the-job training, and other training programs are critical examples of how to create a demand-drive talent pipeline through the workforce system. It is vital that such training programs be fully accessible to people with disabilities. At the federal level, the Office of Disability Employment Policy has worked hard to generate resources which can open up these exciting programs to "youth and young adults with a full range of disabilities." The regulations related to apprenticeship which have recently come out of the Department of Labor provide states the flexibility them need to refine and design training programs that maximally inclusive of people with diverse talents. We encourage you to invest time and energy to understand the best practices contained in ODEP's apprenticeship toolkit.

Partnerships for apprenticeships and internship should be created with federal contractors who have 503 requirements and talent shortages. Pennsylvania should identify federal contractors with Section 503 requirements and have talent acquisition needs for partnership opportunities that can be win-win-win for employers, people with disabilities and taxpayers alike. Placing programs like the highly successful Project SEARCH program at Federal contractors can be worthwhile for non-STEM jobs as well.

- Hospitality and Hotels – An Great Opportunity for Expanding Project Search
Employers working in this sector can greatly benefit from the loyalty, dedication, and retention rates of employees with disabilities. An outstanding example of the type of work needed is found in Missouri. As part of the Poses Family Foundation's Workplace Initiative, a coalition of employment service providers have launched a successful training and placement program with the hospitality sector in St. Louis. This training runs for up to 12 weeks, and takes place on site at the hotel; all participants are paid by

the hotel for the duration of training. Since the summer of 2015, two cohorts of trainees have completed training at the Hyatt Regency. Trainees have gone on to permanent employment at the Hyatt and other hotel partners in a range of departments—culinary; auditing; and customer service. This type of training and Poses’ Workplace Initiative could easily be part of the overall Sector Strategies for California.

Likewise, in other states, hotels and other hospitality employers have found Project SEARCH to be an amazing source of talent. The work done by Embassy Suites and David Scott in Omaha, Nebraska offers valuable lessons that can enable Pennsylvania to improve employment outcomes for people with disabilities.

Response: PDE will work with OVR to explore the Project Search model, models like it and other such market niches as opportunities for integrated employment for youth with disabilities.

- **Conclusion:** The undersigned organizations thank the taskforce that produced this Workforce Innovation and Opportunity Act Combined Plan for Pennsylvania. It starts a great roadmap to improving employment for all those who experiences barrier to productive employment. People with disabilities have been excluded from true employment opportunities for too long. But the bottom line is that expanding job opportunities for people with disabilities is win-win-win for employers, taxpayers and people with disabilities alike. It is good for employers because the loyalty, talent, and skills of workers with disabilities contribute to the employers’ bottom line. It is good for the workforce system because improving services and supports for job seekers with disabilities will benefit others with different barriers to employment. It is good for people with disabilities who want the dignity, pride, friendships, independence and income that work provides.

Response: We appreciate the comments in support of the plan and agree with the sentiments expressed by the commenter.

Juniata College offered the following comments:

- **Training Expenditures:** While there is certainly value to upskilling the commonwealth’s workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system encompasses much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title I funds to training will negatively impact the delivery of valuable career and business services in our region. We anticipate reductions in program staff, including career planners and business services specialists, and also the downsizing or closure of some PA CareerLinks® in the Southern Alleghenies. The establishment of benchmarks based on a percentage of the local workforce area’s federal allocations negates the many other valuable services the local workforce system provides to employers and job seekers. Each year the Southern Alleghenies Workforce Development Board allocates some 20% of its Title I funding and 100% of its Rapid Response

dollars in support of retraining and each year a portion of these funds go unspent. Many of our residents are not interested in pursuing additional training; they simply want to rejoin the workforce.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- PA CareerLink® – Online Services as an Enhancement: PA CareerLink® centers serve as the storefront and face of and for the delivery of services to businesses and job seekers in the commonwealth. While increasing the quantity and quality of online, self-service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society, the reality is that many of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Furthermore, considerable portions of our region are not serviced by high speed internet. Online services cannot replace face-to-face career coaching and mentoring as well as the many other hands-on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities.

As a partner in the public workforce development system, we understand our role as stewards of the public workforce dollars; we are also committed to ensuring that our residents have access to vital services. Thank you for the opportunity to provide these comments and we hope they will be given due consideration.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

Carmen Rosa Kahiu, **Kahiu Shelter Investments**, commented:

- Training Expenditures: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title I funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well as job seekers that contribute to the regional economy.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- Priority of Service Benchmarks: Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self-service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face-to-face career coaching and mentoring as well as the many other hands-on training and other programs delivered at PA CareerLink(R) centers that lead to employment success and add value to our communities.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

Kencrest EmployNet submitted the following comments:

- Pennsylvania Workforce Innovation and Opportunity Act (WIOA) Combined State Plan includes the state's strategic vision and goals for developing its workforce and meeting employer needs in order to support economic growth and economic self-sufficiency. These goals support engaging individuals with barriers to employment in opportunities and supports to enable them to attain a job that pays. This includes goals to Establish Career Pathways, Invest in Strategic Partnerships with Employees and Educational Institutions, Increase Work-Based Learning Opportunities for Youth, Engage employers to strengthen the Connection of Education and

training and the economy, and strengthen data sharing.

As a provider of services to individuals with intellectual disabilities it was encouraging to note the inclusion of goal 2.10 “Employment First” in Section I, Strategic Vision for Workforce Development in the Commonwealth Of PA. Furthermore the idea that Pennsylvania could become “a model state when it comes to creating a climate hospitable to workers with disabilities” is very encouraging. However this commitment is not reflected in the execution of the plan in a number of ways including:

- Alignment with Other Partners Programs (page 42) the proposed MOU Memorandums of Understanding will be supported by limited funds and based on availability of funds and assessment of available resources on a year to year basis.
- Strategic Vision for Workforce Development in the Commonwealth of PA, under five broad goals on page 8 there is reference to an “emphasis on Pennsylvanians with barriers to employment an opportunity to obtain a job that pays.” It is not clear if this plan also places an emphasis on the placement of individuals into competitive integrated employment, and the use of fully integrated settings for assessment and career exploration activities (including during transition), and avoidance of settings that segregate and reinforce stigma.

Response: We appreciate the comment in support of Employment First and assure the commenter that the commonwealth is committed to that goal. An Executive Order was issued by the Governor on March 10, 2016. The commonwealth will seek additional funding, including federal and foundation funding, to support the achievement of the WIOA state plan's goals.

- It was also noted in Section I, Strategic Vision for Workforce Development in the Commonwealth Of PA that the Governor believes this plan, “is the starting point for an unprecedented effort in Pennsylvania to transcend fragmentation”, “Overcoming silos and promoting program integration.” (page8) An expansive and integrated approach is greatly needed to provide individuals with intellectual disabilities with the resources they require to be fully integrated in Pennsylvania’s workforce. Unfortunately this plan does not create an expansive plan for supporting individuals with intellectual disabilities, nor does it address the fractured and antiquated nature of the supported employment service system in Pennsylvania.
 - In reading this plan it was promising to learn of the expansive and detailed plans in place to support both our Veterans (p. 199) and our Senior population (p. 204) in Pennsylvania. Both of these communities are in great need of expert and dedicated supports to assist them in accessing the workforce and are deserving of every resource at their disposal. However, we are disappointed to find no such plan in place for individuals who experience intellectual disabilities.
 - Instead this plan relies almost solely on the Office of Vocational Rehabilitation and makes little effort to address other resources or avenues for funding or supports. This point is well reflected in the chart found on page 45. The Office of Developmental

Programs is not listed as a partner organization under the Department of Human Services.

- The role and responsibilities of the Office of Vocational Rehabilitation (OVR) are well defined (p. 108). However, the heavy reliance on OVR creates one large silo, one which is likely to create stagnated services and will not address the varied needs of the intellectual disability community. Evidence of this can also be found in the lack of a plan for people denied by OVR for employment supports.
- Lastly this plan does not address the independent policies of Administrative Entities which are found to differ; county to county and entity to entity. Without efforts to close loopholes and provide consistent policy statewide, individuals with intellectual disabilities will not be successfully included in our workforce.
- It would be preferable to find a well thought out strategy, fully inclusive of OVR, ODP, Administrative Entities and Providers included in this Combined State Plan.

Response: We appreciate the comment. OVR has entered into a "Memorandum of Understanding" with the Office of Developmental Programs to which specific funding is attached. Additional VR staff who are dedicated to serving individuals with ID and Autism will be hired. In addition, new service delivery models are being developed and implemented jointly with ODP. Interagency staff training is being developed for implementation in the spring of 2016. Service definitions, provider qualifications, rates and policies are being evaluated to bring them into greater alignment across systems. As the MOU was not effective at the time of the development of the Combined State Plan, it was not clearly outlined.

- In reading this plan, it is our belief that it is not reflective of the rehabilitation needs of Pennsylvanians with significant intellectual disability. Once again looking at section 2.10 "Employment First" the definition of which is that competitive integrated employment is the first consideration and preferred outcome of publicly-funded services for all working age Pennsylvanians with a disability. This definition clearly includes all Pennsylvanians not only those with less complex disabilities. Unfortunately, individuals with more significant disabilities have not been adequately included in the WIOA combined state plan as illustrated in the points below
 - There is no outlined planned for how people with significant intellectual disabilities currently served in segregated programming will transition into competitive supported employment.
 - The one point of entry through the Office of Vocational Rehabilitation is disrespectful of the needs of those with significant disabilities who will likely be denied services by OVR- as we have learned from being a vendor organization for OVR for the past 25 years.
 - Collaboration with VR, ODP and the Individual Support Plan process would ensure that individuals with more significant disabilities would receive the needed supports to be successful in the workplace. These supports might include adaptive equipment along with physical and emotional support.

- Lastly- although there is a plan in place (p. 128) to “ensure that OVR’s personnel receive significant knowledge from research and other state of the art methodologies...experts in the field of rehabilitation...at in service training programs”, not one speaker or expert listed is from an organization focused on the needs of individuals with intellectual disabilities. We would strongly suggest that OVR staff receive routine training from Pennsylvania Advocacy and Resources for People with Autism and Intellectual Disability (PAR), the Association for People who Support Employment First, and the American Association on Intellectual and Developmental Disability (AAIDD).

Response: We appreciate the comment that supports increased collaboration and partnership between OVR and ODP to assist people with significant intellectual disabilities.

Keystone Community Education Council offered the following comments:

The Community Education Councils funded under the Department of Education play an integral part in the local workforce development system for our service areas. We are Educational Facilitators serving over twenty counties with a population of over one million. The CEC’s are coordinators of a network of public/private programs and must remain institutionally neutral. The CEC’s act as Resource Centers for the area adults and are providers of seamless services using limited staff and infrastructure.

Because we play a major workforce development roll in the areas that we serve please give consideration to adding the following to the State Plan.

- Page 39-44 Alignment with Other Partner Programs
 - The Community Education Councils network (CECs) as designated by PDE will align training development efforts with the overarching strategies of the Commonwealth to increase the education and training delivery to residents of rural communities.
- Page 51-53 Leveraging Resources to Increase Educational Access
 - The Community Education Council network (CECs) as designated by PDE have historically leveraged other state and local funding to implement sector based training provided through a variety of educational institutions in rural communities where campus locations are non-existent. CECs serve as an intermediary and broker of training programs based on identified need and demand.
- Page 53 under the heading Improving Access to Postsecondary Credentials
 - The Community Education Council network (CECs) as designated by PDE will extend program development activities with postsecondary institutions to ensure that residents of rural communities have access to credential bearing training opportunities.

Response: We agree that the Community Education Councils are important partners and have included them in the final State Plan on page 40, 51 and 53.

Lehigh Carbon Community College offered the following comments:

- How will this plan affect the Perkins Career and Technical Education program? Will educational institutions receiving Perkins funds be required to use part of their Perkins allocation toward WIB services? Will institutions be restricted in how they use their Perkins funds (i.e., specific programs or activities)?

Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re-evaluate the fit between Perkins and WIOA as federal guidance becomes available. As such guidance is issued, there may be changes in how Perkins funds are allocated or how they may be expended. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor's goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to maintain Perkins as part of the WIOA state plan.

- Will development of career pathways be a requirement for Perkins funding? Are there specific industry sectors we will need to target for career pathways?

Response: Federal Perkins recipients must meet the federal Perkins mandates and required uses of funds. The purpose of Perkins is to improve CTE programs. Each recipient must develop and offer programs of study and if the programs of study align to the career pathways developed under WIOA, then the Perkins recipient should align the program of study with the career pathway.

- Will we be required to develop partnerships with WIBs or employers for Perkins funding?

Response: Perkins recipients must work with the LWDBs. LWDBs are already a required member of the Participatory Planning Committee.

- We at LCCC would like Perkins funds to continue to be allocated directly to the community colleges and recommend that the Commonwealth separate Perkins from the state's combined WIOA plan.
 - There are no evident benefits of combining Perkins with the state WIOA plan.
 - Mixing Perkins into the WIOA plan creates an additional bureaucratic structure, additional paperwork, and another layer of reporting requirements.
 - Placing Perkins into the WIOA decreases an already shrinking amount of funds available to the colleges providing the direct training. There is already more demand for Perkins services than the existing appropriation can support.

- The state's community colleges have a long history of managing Perkins funds effectively to link education, course alignment and training to workforce needs. To date, we have not been made aware of any issues related to our management of Perkins funds and there is no need to make changes to a system that works effectively.
- Community colleges have a strong working relationship with PDE relative to the use of Perkins funds.
- By definition, Community Colleges remain committed to strategic employer engagement and will continue to work closely with CareerLink and our technical institutes to leverage access and use of resources.

Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re-evaluate the fit between Perkins and WIOA as federal guidance becomes available. As such guidance is issued, there may be changes in how Perkins funds are allocated or how they may be expended. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor's goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to maintain Perkins as part of the WIOA state plan.

- It is also important that the state use the Governor's "set-aside" for business education partnerships with community colleges since we already have an administration and faculty infrastructure in place.

Response: The commonwealth appreciates this comment and will take it into consideration when making final decisions regarding use of the Governor's set aside funds.

- LCCC has been designated as a veteran friendly campus and we would like to share our knowledge and expertise as a model/best practice for others across the state to follow.

Response: The commonwealth appreciates this comment and the offer to serve as a model/best practice.

- We recommend that the PA-TIP include more health care occupations due to the fact that these are generally well paid careers in high demand in Pennsylvania. Including more health occupations in PA-TIP would help more students gain education and employment in these industries.

Response: PA-TIP is a program created by the legislature in 2012 to prepare students with the skills in high demand by today's employers. The program, funded and administered by PHEAA,

provides awards to students enrolled in specified programs of study. We will reach out to PHEAA regarding this request.

- We recommend that "completion of academic credentials" be the performance measure for training providers. We have concerns regarding "employment" as a performance measure.
 - It is challenging for the College to efficiently track students' employment once they complete their degree.
 - Students sometimes have other issues (e.g., cannot pass drug screening, cannot pass credit checks, have psychological or other trauma making them undesirable candidates for some employers, etc.) that are not related to their education and training and College's should not be held to employment as a means of determining whether or not the academic program is successful.

Response: We appreciate your comments and understand your concerns surrounding employment as a performance measure for training providers, but this is a federal requirement the commonwealth is unable to amend. We also appreciate the suggestion of including completion of academic credentials as a measure. The WIOA legislation includes credential rate as a performance outcome and eligible training provider measure.

- Regarding the 2nd paragraph on page 21 and our service to rural parts of the state, LCCC would like to express the fact that we have been serving rural populations for over 50 years. We even have a foundation scholarship that provides for free full Associate Degrees for a select group of students.

Response: The commonwealth agrees that several of the community colleges have moved beyond their sponsoring service areas to provide education and training to unserved areas. The commonwealth has been a partner in many of these endeavors by providing capital funding to the sites and learning centers when possible. That does not negate the fact that there are still many rural counties that do not have comprehensive community college services available to its residents.

The Philadelphia Office of the **Local Initiatives Support Corporation** offered the following comments:

On behalf of the Philadelphia office of the Local Initiatives Support Corporation (LISC Philadelphia), we thank the Department of Labor and Industry for the opportunity to make comments on the Commonwealth of Pennsylvania's Combined State Plan for the Workforce Innovation and Opportunity Act (WIOA). We are pleased to see a focus on career pathways for adults and youth throughout the plan and have additional suggestions for ensuring that workforce development services help jobseekers achieve financial capability.

LISC Philadelphia is a local office of a national non-profit community development organization dedicated to strengthening neighborhoods and improving lives of residents. LISC Philadelphia combines

corporate, government and philanthropic resources to help community-based organizations transform disadvantaged neighborhoods into healthy, sustainable ones-- good places to live, do business, work and raise families. As part of its local work, LISC Philadelphia plays the role of facilitator of economic and community-based activities in three targeted sections of the city. This targeted work includes support of four Financial Opportunity Centers™ (FOCs), which are integrated service centers that combine workforce development, financial education and benefits access.

Our strategic focus has broadened to incorporate Workforce Development into the core of our place-based economic opportunity strategies. This allows us to facilitate a direct linkage between our anchor institutions, community partners, local employers, and participants in our industry sector partnerships with jobseekers within our targeted communities.

While LISC Philadelphia believes the Combined State Plan serves as a solid basis for progress and growth, particularly regarding integrated services delivery, industry partnerships, and an expanded emphasis on youth, following are our brief comments for your consideration:

- **Training Should Be Driven By Local Demand:** Pennsylvania is an economically diverse state, featuring areas rich in agriculture, industry, and service industries. The Philadelphia region has a combination of all facets of Pennsylvania's economy, making that it a unique economic engine for the Commonwealth. It is important the WIOA plan include provisions for allocation of funds for training and workforce development based on local and regional economic data that defines and projects specific areas of economic and corresponding occupational growth. The Local Workforce Development Board and its collaborative partners should be given a measure of flexibility in the allocation of workforce investments based on local and immediate employer demands and emergent opportunities.

Response: We appreciate the comments in support of a focus on career pathways for adults and youth. Regarding training targets, we have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- **Extension of wrap-around services:** In support of apprenticeship programs that serve as access nodes to current and emerging career pathways, provisions should be made for wrap-around services. Examples of these services include aptitude assessment, career exploration, transportation and childcare assistance, financial services, and remedial job training activities.

Response: We agree with the commenter and note that these additional services are generally available to workforce customers who meet eligibility requirements.

- **Broaden Training Opportunities:** All of the target populations listed in the plan face complicated barriers and would benefit from tailored training opportunities that address obstacles specific to their location as opposed to an identified statewide need. We recommend that the Local

Workforce Development Board's contracted integrated services centers be encouraged to partner with agencies such as LISC that focus on place-based services that target portions of Philadelphia that exhibit both the greatest needs for resources and very specific sources of economic opportunity. For example, the Promise Zone, which includes University City and portions of West Philadelphia, is experiencing significant growth in Construction, Information Technology, and Health Sciences; it should have access to workforce resources focused within these sectors. The integrated services center in West Philadelphia can serve as a conduit for this localized and specific approach, as well as serving as a model that can be replicated in the city's HUD CHOICE neighborhoods and elsewhere. This would assure participants reflect the demographic makeup of the neighborhood served by the centers and derive the most direct benefit of the localized economic growth. This would also make great progress toward the WIOA's priority-of-service goal of reaching 'harder to serve' individuals. Additionally, Industry Partnerships, a proven and successful model, should incorporate training funds for job entrants in emerging sectors.

Response: We appreciate the comment and agree that local WDBs should make decisions regarding sectors to target in their respective areas.

Luzerne County Community College submitted the following comments:

- Luzerne County Community College recommends that the Commonwealth separate Perkins from the state's combined WIOA plan. We are unclear what the benefit is of combining Perkins with the state WIOA plan. Including Perkins with the WIOA plan will impose an additional bureaucratic structure and increase paperwork and reporting requirements, while at the same time decreasing the amount of funds available to the training providers. There is already more demand for Perkins services than the existing appropriation can support, so diverting even a small percentage to bureaucratic overhead reduces the amount of funding directed toward students and clients of the workforce system. The current structure is effective and efficient. Perkins is currently being considered for reauthorization in the U.S. Congress. Including Perkins in the WIOA plan may make it more difficult to comply when reauthorization is complete. Community colleges have a strong working relationship with PDE relative to the use of Perkins funds so there would seemingly be nothing gained by incorporating what is an academic and career development educational support structure into the WIOA Legislation.

Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re-evaluate the fit between Perkins and WIOA as federal guidance becomes available. As such guidance is issued, there may be changes in how Perkins funds are allocated or how they may be expended. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor's goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career

and technical education is an integral part of the workforce development system. Therefore, we have decided to maintain Perkins as part of the WIOA state plan.

- We recommend that the Commonwealth consider leveraging the experience and expertise of the community colleges in the workforce system, rather than concentrating funds in, and requiring decision-making to be run through, the WIBs and CareerLinks. Community colleges have significant experience in serving the targeted populations and experience working with community partners to provide wrap around services. The Community Colleges also have good working relationships with employers in the local community. We work with Advisory Employer Groups in our various Credit and Non-Credit Career Programs, regularly participate on regional workforce and economic intermediary groups, and work with individual employers in a variety of activities that help support skills development and academic training for the emerging, incumbent, and transitioning workforce.

Response: Community colleges are an important partner in the workforce system. The community colleges do have very good relationships with employers in the local communities that they serve. However, there are large areas of the commonwealth where the community colleges do not have those strong relationships. As such, the commonwealth disagrees that the community colleges can take the place of the LWDBs and PA CareerLink® centers.

- We recommend that community colleges be represented on the Workforce Investment Boards, Board Subcommittees (p. 57) and on the Youth Councils when they share geography. (First paragraph on page 13 and Item 3.3 on page 14). Community Colleges have extensive experience in serving youth aged 18-24 and would add value to the WIB's and their Subcommittees.

Response: We appreciate the comment and encourage state Board members, of which two currently represent community colleges, to participate on the committees of interest to them. Local workforce development board membership is determined by local elected officials.

- We recommend that the state use the Governor's set-aside for business education partnerships with community colleges. The Community Colleges are often represented on BEP's, but Community Colleges could serve as the conveners for these partnerships due to their sustained ties to the employer community.

Response: The commonwealth appreciates this comment and will take it into consideration when making final decisions regarding use of the Governor's set aside funds.

- We think it is important to stress that hours in KEYS counts toward the TANF monthly work requirement set forth by the County Assistance Offices. Many potential students are told by CAO's in order to be eligible for KEYS they must apply for jobs. If the candidate then finds a job,

their TANF usually closes then making them ineligible for TANF (cash assistance) and therefore ineligible for KEYS. We think it is important to also stress time in the classroom and studying done at home and on campus meets the work requirement.

Also, time in KEYS is unlimited. There is a misconception that once referred a student can only be in the program for 2 years. The KEYS Program is currently allowed to use 24 months of vocational time, but time can be saved by participating in other allowable activities. DHS is also allowing for 6 month extensions once 24 months has been used if the student meets certain criteria. One of that criteria is that the student is enrolled in a degree that will lead to a high priority occupation.

Although SNAP recipients are eligible for the program, the number is limited based on current guidelines.

This program is only promoted by a few select staff members at the CAO's. If the Community Colleges had more input/control over the referral of potential KEYS recipients, it might help connect students to services more efficiently as serving students is part of our core mission.

Response: As a condition of eligibility for cash assistance, applicants over 18 years of age who are not employed a minimum of 20 hours per week are required to apply for at least three jobs per week while their application is pending. However, a student or prospective student may meet their Work Participation Rate while enrolled in KEYS through any of the core activities allowable, including Vocational Education, as long as they adhere to the time limits for each activity. The participant's activities are determined by the participant and KEYS provider once the referral is made. DHS agrees that there is a misconception that KEYS is a time limited program. KEYS is not a time limited program although certain activities, such as Vocational Education, have time limits. We believe this misconception will be avoided in the future through the implementation of the KEYS Vocational Education Exception Policy, OPS Memo 15-09-03. The KEYS budget is 80% TANF funded and 20% SNAP funded. In order to ensure the proper appropriation of staff time and services, SNAP enrollment per KEYS program cannot exceed 20% of their total enrollment. DHS is currently reviewing that split. CAOs are responsible for determining appropriate referrals to an Employment and Training program. They are instructed, per OPS 14-06-01, to refer any client that is enrolled in or expresses an interest in enrolling in one of the community colleges to the KEYS program.

- Luzerne County Community College advocates for the addition of CIP 51 to cover more health care occupations as follows, "Health care occupations are significant to the current and future workforce growth and economic viability of the Commonwealth. Expanding the eligible PA-TIP programs to include the health care industries would provide much-needed financial assistance to students seeking to be employed in these critical occupations."

Response: PA-TIP is a program created by the legislature in 2012 to prepare students with the skills in high demand by today's employers. The program, funded and administered by PHEAA, provides awards to students enrolled in specified programs of study. We will reach out to PHEAA regarding this request.

- Data reporting requirements pursuant to WDQI are burdensome on Community Colleges as the number of WIOA-funded participants is usually less than 1% of the total student population, but we are required to report on all students within CareerLink state-approved programs. Similarly, Community Colleges and all training providers are held accountable for performance measures of all students, not just the WIOA-funded students. This places additional burden on the staff responsible for collecting and reporting on the data/performance.

Response: Collection of performance data for all eligible training providers is a federal requirement for which the commonwealth is unable to provide a waiver. The commonwealth is committed to identifying ways we can meet the federal requirement and ensure workforce program participants have access to a robust list of training opportunities.

- The State plan continues to rely on L&I's HPO list. While the list is valuable to guide curriculum development and continued investment in programming and training that supports HPO's in the region, the fact that the list changes every year makes planning in 2-3 yr. cycles more difficult. We would offer that new programs be added every year as appropriate, but that there be some sort of provision for sustainability of programs over a 2-3 yr. cycle before removal to allow for more suitable planning and investment.

Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned.

- Luzerne County Community College serves rural counties (2nd paragraph on page 21) through both off-campus site access and on-line coursework. The College is pursuing additional program completion options in Centers beyond the main campus in Nanticoke. There are program completion options at Northumberland Regional Center, Hazleton, and Berwick Centers currently and additional sites are being considered at this time. These Centers serve a more rural population in addition to the populations right in the city/town in which they are located.

Response: The commonwealth agrees that several of the community colleges have moved beyond their sponsoring service areas to provide education and training to unserved areas. The commonwealth has been a partner in many of these endeavors by providing capital funding to the sites and learning centers when possible. That does not negate the fact that there are still

many rural counties that do not have comprehensive community college services available to its residents.

Luzerne/Schuylkill Workforce Investment Board, Inc. offered the following comments:

The Luzerne/Schuylkill Workforce Board (LS WDB) supports many of the Governor's goals and objectives as identified in the proposed state plan. We agree that each local area and region plans to exert its utmost efforts in meeting/exceeding the Governor's agenda as described in the proposed state plan. With this underlying understanding, the LS WDB respectfully submits the following comments with reference to the Governor's goals/objectives as set forth in the plan. We are requesting consideration of incorporating flexibility allowed and encouraged by WIOA into the plan that will permit local areas and regions to be responsive to the differing needs of their job seeker and employer customers.

- Training Benchmarks (WIOA Plan 2.1, p. 10) and Priority of Service (WIOA Plan p. 67): training expenditure goals:
 - Exclude dislocated workers from the training expenditure calculation as their eligibility is not based upon barriers. We believe this to be the intent, but it is not clear in the language of the plan.
 - Exclude youth from the training expenditure calculation as all youth must have a legislative barrier to be able to participate in a WIOA-funded program. We believe this to be the intent, but it is not clear in the language of the plan.
 - Exclude the 10% administrative portion of Title I contracts when calculating the minimum training expenditures, mimicking how the 75% out-of-school youth minimum expenditure requirements are calculated.
 - Include all allowable training activities under WIOA section 134 as well as, National Emergency Grants and other similar Federal Grants, Industry Partnership Grants, work experience and internships in calculating training expenditures.
 - Include PELL, scholarships and other forms of financial aid to offset the Title I training target.
 - Include training conducted under other federal funding, including but not limited to American Apprenticeship, H1-B, National Emergency Grants and National Dislocated Worker grant programs, to offset the training target.
 - Include one-stop partner program training expenditures for participants dual enrolled in the one-stop partner program and WIOA (e.g. Trade Act). We believe this to be the intent, but a statement to that effect would make the section clearer.
 - Include the cost of assessment and case management necessary for participants to enroll in and successfully complete training.
 - Include the cost of registration, books, lab fees and required uniforms.
- It is recommended that with respect to the goal of expending 50/60/70% of Title I training expenditures on individuals with barriers, additional clarification to this section be considered as described below:

- Exclude dislocated workers from the calculation as their eligibility is not based upon barriers.
- Include the local board definition of not earning a “self-sufficient” wage as one of the barriers.

It is recommended that the state plan also include a recognition that individuals with barriers may not always have the necessary qualifications, as required by WIOA §134, to succeed in training without further assistance from an adult literacy program or a stabilizing social service assistance. PA CareerLink® staff often refer these individuals for the assistance they need in order to be able to participate in training once their issues have been addressed.

Response: We appreciate the comment in support of many of the Governor's goals and objectives and the local area's plans to meet and exceed those goals. The State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved. In regard to training benchmarks, we have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets. We have also made clear that administrative funds will not be included when calculating training targets.

- Similar to the recommendations with regard to the training expenditure thresholds, it is respectfully submitted that the state considers the following clarifications with respect to “priority of service”:
 - Exclude dislocated workers as their eligibility is not based upon barriers.
 - Include those individuals who fit in the local board definition of not earning a “self-sufficient” wage as one of the barriers, or that these individuals be considered low income, thereby entitling them to a priority of service.
 - Reconsider including the requirement to inform individuals, other than veterans and their spouses, seeking to access WIOA services of their priority of service. WIOA is not an entitlement program. By informing individuals of their priority, there is a concern that this will lead to complaints where an individual is not provided services due to other reasons.
 - It is recommended that the state consider incorporating a waiver process for local boards that can justify a rationale for setting a lower goal than described in the state plan for training expenditures and services / training for individuals with barriers.

Response: We appreciate the comment and agree that the 70% requirement should only apply to the WIOA Adult and Youth funding streams and will make that clear in the state plan. We will also edit the plan to note that only individuals otherwise eligible for WIOA services should be informed of priority of service status. The commonwealth will also reassess the priority of service threshold on an annual basis.

- Performance Measures: Pennsylvania's 23 local areas are anxious to deliver and exceed the performance baselines that will be negotiated by the state and which are contained in the draft

plan. Because states and local areas are still transitioning to WIOA, and participants enrolled prior to publication of the measures will be included in the determination of the WIOA measures next year, it is respectfully suggested that consideration be given to lowering the targets for the performance measures to the baseline met by the state during its last year of performance under the Workforce Investment Act. This suggestion is premised upon the following:

- The parameters for the calculation of the measures have not yet been issued by the U.S. Department of Labor and will not be issued until after the state plan is due.
- There are three (3) new adult/dislocated worker measures for which there is no existing baseline established under previous legislation upon which to estimate performance.
- There are four (4) new youth measures for which there is no existing baseline established under previous legislation upon which to estimate performance.
- The method for calculation of all the WIOA measures will not be the same as under previous legislation.
- Data needed by states and local areas to manage performance is a challenge to obtain because it is partially based on the Wage Record, which is nine (9) months in arrears. As a result, course corrections cannot be made until the year after performance for the previous year has already been determined. Under WIOA, the U.S. Department of Labor will be working on how to improve reporting; however, as we enter into WIOA we are still working under the current reporting system.
- The penalty to states for not meeting the WIOA measures can be as much as a reduction of 5% to the State's 15% portion of the grants (WIOA § 116(f)).

It is respectfully submitted that the state can set a lower baseline for performance in the plan while still encouraging and incentivizing local areas and regions to meet the Governor's thresholds. In doing so, local areas and the state can strive toward the Governor's goals without placing undue pressure and risk on the state and local system.

Response: WIOA presents many new performance measures and goals. For many, there is little or no baseline information. The targets as expressed in the plan represent a starting point for conversations among providers, partners, and policy-makers.

- Recognizing the Roles of State and Local Areas/Regions in the Plan: The LS WDB recognizes and applauds the Governor's goals for the citizens, residents and employers of our great state. It is the intent of the local workforce development boards to exert our best efforts to make the Governor's goals a reality for the Commonwealth of Pennsylvania. In enacting WIOA, Congress assigned roles to the states and to the local workforce development boards. The responsibility of the state board can best be summed up by the language of WIOA § 101 (d)(12), which includes as a function of the State Board the responsibility to develop policies to promote statewide objectives and enhance the performance of the state workforce development system. At the local level, pursuant to WIOA §107 (d), local elected officials together with the local boards are responsible for setting policies, approving how funds will be spent (the budget), and

analyzing local conditions so they can make determinations on the type, mix and investments in services and training with their WIOA allocation. It is respectfully submitted that the state consider the benefit of allowing local boards the agility embedded in the law to be responsive to local area needs, which vary across the state, by incorporating as much flexibility as possible into the various sections of the state plan and into the policies that will be adopted to implement WIOA.

Response: We appreciate the comment and note that the State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved.

Making Work Pay PA submitted the following comments:

The Making Work Pay PA Coalition strongly supports Pennsylvania's Proposed State Plan implementing the federal Workforce Innovation and Opportunity Act.

The Making Work Pay PA coalition is a state-wide group of advocacy and direct service organizations that have come together to develop recommendations for measures that government can implement to better ensure that low-income families are always better off when parents go to work, work more hours, or earn promotions or raises.

As advocates for low-income working families, including families that receive public assistance, our interest in the WIOA State plan is focused primarily on: (i) priority of service for recipients of public assistance and other low-income persons; (ii) Career Pathways programs; and (iii) transitional jobs. More detailed comments supportive of the Proposed Plans provisions in these areas have been submitted by Community Legal Services and the Community Justice Project. The Making Work Pay PA Coalition endorses those comments.

We support the Proposed WIOA State Plan because it offers real promise of education, training, and paid work experience for parents whose families receive public assistance and who wish to raise their families' standard of living through employment in jobs that are in demand and pay a family sustaining wage. Pennsylvania's proposed WIOA state plan would provide these families the avenues and opportunities they need to obtain these kinds of jobs.

Priority of service for families receiving public assistance was a requirement in the Workforce Investment Act (WIA) and the Job Training Partnership Act (JTPA) before that. For the most part, however, states did not live up to their obligations under this provision. National data show that only 48.7 percent of adult "exiters" who received training and/or intensive services through the WIA Adult funding stream were "low-income individuals" in Program Year 2013 – a marked decrease from 71.3 percent in Program Year 2001. And only 3.8 percent of those served in Program year 2013 were TANF recipients.

To address past failures, WIOA strengthens WIA's priority of service requirements. It also adds a

promising new adult education opportunity for low-income parents in need of GED, ESL, or literacy instruction through its emphasis on Career Pathways programs, which offer adult education infused with career counseling and assistance with transition to postsecondary jobs skills training. Moreover, WIOA permits up to 10% of training funds to be used for transitional jobs (subsidized employment) for low-income parents who lack work experience or face other barriers to employment.

The following are the specific provisions in the Proposed Plan that we support:

Priority of Service

We think the plan, as proposed, does a good job of addressing the training needs of low-income parents through strong and mandatory provisions implementing WIOA's priority of service provisions for recipients of public assistance and other low-income persons, as well as by setting benchmarks for providing training services to these high needs priority groups. (See, Proposed WIOA State Plan, pp. 10-12, 2.1 and 2.11)

The proposed plan also includes specific guidance to Local Workforce Development Boards (LWDBs) and CareerLinks on what "priority of service" means and how it works, which we think is absolutely essential to successful implementation of priority of service for the high needs groups targeted by WIOA. (See, Proposed WIOA State Plan, pp. 67-70)

Career Pathways

The proposed WIOA state plan would require that Local Workforce Development Boards (LWDBs) and CareerLinks develop and operate Career Pathways programs, as defined in WIOA, and that such programs provide for entry at the literacy, ESL, or GED level . We strongly support these provisions.

Transitional Jobs

The proposed WIOA state plan includes a requirement that LWDBs and CareerLinks use between 5% and 10% of their funds to provide transitional jobs and that they ensure that priority of service for transitional jobs is afforded to individuals who qualify for priority of service. (See, Proposed WIOA State Plan, p. 70) We strongly support this.

We urge the Pennsylvania Department of Labor & Industry to retain the above provisions in the final state plan, with the clarifying edits suggested by CLS and CJP in their more detailed comments.

Response: We appreciate the comments in support of the State Plan, including: your recognition of the important role our adult basic education services provide in career pathways for low income adults; your comment in support of ensuring that career pathways are accessible to individuals with basic skills needs; your comments in support of the Priority of Service and Career Pathways provisions in the State Plan; and your comment in support of the transitional jobs requirements in the State Plan.

Dr. Madeline Seltzer, **Manor College**, offered the following comment: I am against this combined plan at this time. Parts of the plan are not clear. I would like the Perkins Career and Technical Education parts to

be reworked. In addition, I would like implementation to be postponed until Perkins 5 comes up for approval.

Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re-evaluate the fit between Perkins and WIOA as federal guidance becomes available. As such guidance is issued, there may be changes in how Perkins funds are allocated or how they may be expended. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor's goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to maintain Perkins as part of the WIOA state plan.

Anne Knop, **Manor College**, submitted the following comment: Please do not implement the WIOA Combined State Plan at this time. Because parts of the plan are not clear, the Perkins Career and Technical Education components need to be reworked. In addition, I would like implementation to be postponed until Perkins 5 comes up for approval.

Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re-evaluate the fit between Perkins and WIOA as federal guidance becomes available. As such guidance is issued, there may be changes in how Perkins funds are allocated or how they may be expended. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor's goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to maintain Perkins as part of the WIOA state plan.

Shirley Colleston, **Manor College**, offered the following comment: I do not approve the combination of the six grant programs authorized under WIOA. At this time, the Perkins Career & Technical Education programs should first be reviewed; thus, postponing the "combination" until Perkins 5 has been submitted for approval.

Response: The six core programs are required by WIOA and the commonwealth has no discretion in that regard. Likewise, submission of the state plan is a federal requirement and the commonwealth cannot postpone implementation until a time when Perkins Career and Technical Education is approved. The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re-evaluate the fit between Perkins and WIOA as federal guidance becomes available. As such guidance is issued, there may be changes in how Perkins funds are allocated or how they may be expended. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor's goals for the

workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to maintain Perkins as part of the WIOA state plan.

Cherie Crosby, **Manor College**, commented: I am writing to express my concerns about WIOA combined plan. At this time, it seems that that combining plans would adversely affect all involved and that it would best that the decision to combine plans be postponed until revisions in the Perkins Career and Technical Education have occurred as well as feedback from public hearings is thoroughly considered as well as it will impact all who are involved.

Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re-evaluate the fit between Perkins and WIOA as federal guidance becomes available. As such guidance is issued, there may be changes in how Perkins funds are allocated or how they may be expended. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor's goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to maintain Perkins as part of the WIOA state plan.

John Miller, **Martin Library**, offered the following comments:

- Pg 9 – 1.4 & 1.5: When the state “encourages” cross-program funding does encouragement actually have any teeth or utility? A major comment I have heard from the local Economic Alliance is that a lack of soft skills is ubiquitous and problematic for the un and under employed. If the target demographic has trouble with soft skills (and things like time management) to begin with – is it reasonable to assume that they will be able to manage co-enrollment in multiple programs?

Response: The law is intended to provide services to individuals with barriers to employment. Funded programs include support services that help participants succeed in their activities.

- Pg 10 – 1.9: What weight and/or utility will badges or credentials carry? Will deals be struck with local employers to have hiring preference for those with badges or credentials? If not, is there any real point to them?

Response: We appreciate the comment and note that employers will be consulted to ensure that badges and credentials are recognized and valued by local employers.

- Pg 14 – 3.6: There are numerous agencies dedicated to improving literacy and increasing proficiency in reading and math. Why does the Commonwealth seek to create tools and models from scratch rather than adopting or partnering with another agency?

Response: We agree with the comment and will alter the plan to indicate that the commonwealth will "leverage" tools and models.

- Pg 18: How, if at all, will the data be shared with other stakeholders throughout the state?

Response: The commonwealth is committed to providing access to data in a manner consistent with the statutes, regulations, and policies governing its release.

Tyrone Clark, **MGC-ERIE**, made the following comments:

- Training Benchmarks: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- Priority of Service Benchmarks: Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- Transitional Jobs: Flexibility in the state plan for the local board to determine how or what funds are used to meet the requirements is advised. Additionally, the need to get approval from the commonwealth to transfer funds from Title 1-B funds from Adult to the Dislocated Worker

Program will negatively impact our ability to be responsive to the needs of dislocated workers in the area such as GETS and Joy Mining.

Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs. Regarding transfer of Title I funds, the commonwealth will review requests to transfer funds as quickly as possible to ensure service delivery is not disrupted.

- **Employer Services:** A definition of High Quality Jobs is necessary to determine the focus of employer services. Recognizing that many of the openings are low end and replacement for turnover and not going deeper into the data is a concern. The plan, in general, does not cover many employer services. The focus is on funding which follows the job seeker and is targeted (70%) to those with barriers to employment and prioritizes three areas 1) recipients of public assistance 2) other low income individuals and 3) individuals who are basic skills deficient.

Response: We appreciate the comment and recognize some subjectiveness in the term "high-quality jobs," although the plan outlines characteristics of high quality jobs (reasonable wages, benefits, full-time stable employment, advancement opportunities, etc.) in the introductory language under Goal 4. While the State Plan emphasizes and encourages high-quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high-quality jobs. We also agree with the commenter that the workforce development system can only be successful if it is responsive to the needs of employers. Goal 2 focuses on developing a pipeline of workers to meet industry needs and Goal 4 speaks to engaging employers and being responsive to their needs.

- **Data Collection (comments 5.1 through 5.7), ROI & Market Penetration (p. 32 table):** While we recognize the importance to protecting data, as a local partner the WDB will need to utilize the information to make local decisions that are not necessarily interesting to the commonwealth. The state plan does not clarify what access the local board will have to the data. In addition the definition for ROI and market penetration are not clear. If employers are not eligible because they do not qualify for services due to high turnover or low wages (p. 29) it will be impossible to meet the imposed requirements. We encourage the commonwealth to share the raw data with the local areas so that improvements in the system can be made.

Response: The commonwealth must ensure the integrity and security of data among all partners and programs. As the volume and diversity of workforce data grows, so too do the opportunities and challenges of sharing information among all involved. We are committed to expanding access within the parameters outlined by statutes, regulations, and policies that govern the release of this data. Additional clarity for the ROI and market penetration measures will be provided once final WIOA regulations are released.

- **High Priority Occupations (HPO) List and High Turnover Positions:** It is admirable that the commonwealth wants to reduce the high turnover rates and focus on retention, but without a change in the method for developing the HPO list it will be nearly impossible. Given the principle of consumer choice used at the PA CareerLinks® it is unlikely that we will experience a reduction in the number of individuals requesting training that is on the HPO list to focus on positions where the turnover is low.

Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned.

Andy Gehman, **MGS Incorporated**, submitted the following comments:

- **Training Expenditures:** While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- **Priority of Service Benchmarks:** Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams

and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- PA CareerLink® – Online Services as an Enhancement: PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self-service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face-to-face career coaching and mentoring as well as the many other hands-on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

David Schultz, **Michael Foods, Inc.**, offered the following comments:

- Training Expenditures: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- Priority of Service Benchmarks: Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to

develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- **PA CareerLink® – Online Services as an Enhancement:** PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self-service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face-to-face career coaching and mentoring as well as the many other hands-on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

Alicia Lentz, **Mifflin County Academy of Science and Technology**, commented: I am the administrator of a small Practical Nursing program in rural Pennsylvania who participates in a consortium of other similar schools for Perkins funding. I have been advised by our fiscal agent that the WIOA Combined State Plan being developed is unclear regarding whether or not Perkins program funds would be diverted into CareerLink budgets instead of as grants directly to educational programs. I would request that the committee consider the significant impact of such a change for small programs such as mine and take more time to analyze the data available to make a sound, long term decision. Perhaps time to collect data from education providers in order to analyze the direct impact on similar programs in Pennsylvania could be used in the 2016 fiscal year and a more clear plan developed for Perkins V. Practical nursing is considered a high need occupation in the state and there is data to suggest that the need for LPN's is increasing even more than for RN's, especially related to care of the elderly. Our program has greatly benefited from Perkins funds to allow us to enhance the clinical training required to produce quality nurses to serve the health care needs of our state. I would appreciate information about this proposal to be distributed to affected programs as the impact is significant and potentially detrimental.

Response: PDE recognizes the importance of the Practical Nursing programs offered across the state and which receive federal Perkins funds. Each recipient has worked to meet the federal mandate to

develop a program of study (secondary to postsecondary) and each recipient has provided a seamless program of study to students pursuing a career in allied health. Students across the state have realized a tuition savings of over \$2,000 as a result of this alignment. With a decrease of \$10 million in Perkins state allocations, PDE also realizes that each Perkins recipient has realized a decrease in federal support. Perkins recipients must continue to comply with federal Perkins regulations and use the Perkins funds as mandated. At this time the US Department of Education (USDE) has not provided guidance on the requirements of Perkins recipients regarding a Combined WIOA state plan. The Pennsylvania Department of Education is not able to provide further guidance on expectations beyond the draft plan but will continue to work with the Perkins recipients as further information is released from USDE. WIOA does require each Perkins recipient to enter into agreement with the LWDB to provide services such as career counseling or career information. This can be in-kind or funds.

Dr. Molly Kinney, **Mifflin County Library**, commented: From my perspective, this plan uses the 'traditional' already in place agencies/departments as the means to achieving the goals. While that structure is already in place, there seems to be little creative thinking that would provide other successful models. For example:

Goal 4: Engage Employers to Strengthen the Connection of Education and Training and the Economy, Increase Investment in Critical Skills and Increase Jobs that Pay

Here in Mifflin County we have the Mifflin County Industrial Development Corporation <http://www.mcidc.org/aboutMCIDC.php> which promotes the growth of employment and income in Mifflin County. They do not "fit" the usual definition of employers, yet they would be a valuable asset in the implementation of the plan. In addition, we have Business 2 Business, a networking and information sharing group of small business owners who could also be utilized in a variety of ways.

Response: Mifflin County IDC currently is a member of the Central Region PREP and plays a significant role in business engagement activities. Dr. Kinney should contact the PREP Coordinator who is located within SEDA-COG to discuss other opportunities within the region. The LWDB will also be reaching out to the economic development agencies in order to develop the regional workforce development plan.

Karey Killian, **Milton Area School District**, commented: I'm a certified library media specialist serving three elementary schools in the Milton Area School District. On my 12-day cycle I see approximately 1200 students. In library classes they are learning life skills such as knowing how to find valid information on the internet, working together with teams to write/develop/produce green screen movies, publishing iMovie book trailers, and learning how to become creative thinkers/inventors/builders/problem solvers with the makerspaces activities.

For the purpose of determining how libraries are preparing Pennsylvania's young scholars for the future, students are becoming keenly aware of the endless possibilities for their future careers as they develop skills that encourage critical thinking, creative ideas, the collaborative design process, and making global connections. I try to connect every student at least one time with classes around the globe through

Skype so that they have a better understanding of how easy it is to build ideas with other people that may not be located in the same zip code.

Makerspaces is one of the best ways for libraries to provide a rich learning environment for all citizens to explore the world of making, inventing, and tinkering. I like to think it's the mission of libraries to provide free resources (more than just books and computers) to everyone in the community. Ingenuity doesn't belong to just those individuals that can afford to purchase things to try something new. Everyone doesn't have access to robotics, STEM related activities, 3D printers, crafts, Legos but everyone can have the opportunity to explore their inventive side when libraries provide the resources, staff and training for individuals to see what they can do.

Response: We appreciate your comments about the librarian's role in sparking creativity and developing students with critical thinking skills.

Montgomery County Community College offered the following comments:

- Perkins: Montgomery County Community College (MCCC) is a postsecondary provider in the Perkins program. The benefits of combining Perkins with the WIOA plan is unclear. Including Perkins in WIOA will add a layer of complexity increasing paperwork and reporting requirements without additional benefit to the students served under the program. The current structure for Perkins has proven effective due to continuous improvements on both the part of PDE as well as the colleges. An increased bureaucratic structure will divert MCCC's efforts from the workforce programs and career services that support students' transition to employment. If Perkins funds are redirected to support the additional bureaucracy under WIOA, this will be at the expense of students where there is already more demand for Perkins services than funds available to support them.

Linkages to WIOA already exist at the state level in the form of the career pathways that are tied to the HPOs identified by the PA Department of Labor and Industry. Locally, Montgomery County Community College is committed to partnering with the Montgomery County Workforce Development Board, MontcoWorks, to ensure that the local workforce is better prepared and moving into high growth jobs. Dr. Links, Interim President, and Dr. Victoria Bastecki-Perez, Vice President for Academic Affairs and Provost, are active members of the MontcoWorks Board. The College has a strong relationship with MontcoWorks that includes their participation in the Perkins efforts.

A representative of MontcoWorks is a member of MCCC's Perkins Committee. The representative assists the College in focusing its strategies more effectively to increase students' skills through the resources available through Perkins. MontcoWorks and MCCC are committed to career pathways and the MontcoWorks representative also shares information on the efforts of other workforce boards and colleges to strengthen career pathways. In addition, best

practices at MontcoWorks regarding career counseling and job search assistance are shared at the Perkins meetings.

Response: As the commenter indicates, Perkins does require involvement of LWDBs. PDE will be revising the Perkins Local Plan to include additional requirements of the Perkins recipients. As noted the recipients will have to document and assure compliance. The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re-evaluate the fit between Perkins and WIOA as federal guidance becomes available. As such guidance is issued, there may be changes in how Perkins funds are allocated or how they may be expended. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor's goals for the workforce system. Community colleges have a good working relationship with PDE.

- **KEYS:** Montgomery County Community College (MCCC) is a KEYS program provider. In order to expand career opportunities for participants in the KEYS program, the College is recommending that noncredit pre-employment career programs be included as allowable training. Noncredit training programs are designed in conjunction with business and industry to ensure that relevant in-demand technical and workforce skills are taught as a short-term training alternative in helping them be more marketable-sooner. Basic skills are improved through contextualized learning and job readiness preparation training. These programs typically articulate to credit through prior learning credit. For example, MCCC's Office Assistant Certificate program, which is a 16-week competency based program that includes micro-credentials, stacks for nine credits to the credit Office Management Certificate which is one of the pathways to the Management AAS degree.

Response: The obtainment of employment is the priority of the program. Program specific questions can be answered by the KEYS coordinator at the college.

- **Engagement with Educational Institutions:** For the sixth time, in December 2015 Victory Media designated Montgomery County Community College (MCCC) as a "Military Friendly School." The College is willing to share its best practices with other colleges and universities. All branches of the armed forces receive prior learning credit for basic training and discharge. There is the potential of receiving additional credit for other types of military training. A Veterans Resource Center (VRC), located in a renovated farmhouse at MCCC's Central Campus in Blue Bell, plays an important role in the lives of the institution's veterans. Here, students can meet with Veterans Services staff, participate in study groups and tutoring, and build an important support network with their peers. Orientation and advising services are part of the mix as well as educational offerings that are geared towards veterans. The Student Veterans Organization meets weekly in the VRC and functions like a student club. The group engages in advocacy and education around veterans' issues and participates in a variety of community service opportunities.

Response: The commonwealth congratulates MCCC on its designation as a Military Friendly School and is grateful for MCCC's offer to be a source of Best Practices.

Neighborhood Allies, Northside Common Ministries, and Oakland Planning & Development Commission jointly offered the following comments:

This letter is a response to the draft Pennsylvania Workforce Innovation and Opportunity Act (WIOA) Combined State Plan for the period of July 1, 2016 through June 30, 2020. We appreciate the opportunity to provide comments on this document that will guide state and local efforts to support struggling families.

- Page 188 of the PA Combined State Plan addresses “Work and Self-Sufficiency” for TANF recipients and asserts that, “The primary means to achieve self-sufficiency is through work. The program emphasizes a work-first approach as part of a continuum of services which can establish a work history, with increasing wages and benefits that lead, over time, to economic independence and self-sufficiency.” We agree that employment is pivotal for low-income individuals; however, we believe that a job is often not enough to reach self-sufficiency. Research from the Urban Institute shows that adults entering workforce development programs have several financial challenges beyond unemployment, which, taken together, can create barriers to getting a job and limit a household’s ability to become financially stable. Organizations that work with individuals to address workforce skills gaps can integrate additional services into their programming to address households’ financial challenges in ways that lead to longer-term stability. Programs like the Financial Opportunity Centers (FOCs) that we have launched and continue to support in the Pittsburgh region at Mon Valley Initiative, Northside Common Ministries, and Oakland Planning and Development Corporation offer opportunities to improve knowledge, skills, and access to affordable financial products (such as credit-building loans called Twin Accounts™) through financial coaches, who supplement workforce services offered by employment counselors. Helping unemployed and low-income residents of Pittsburgh and Allegheny County to become more financially secure positively impacts their ability to obtain and maintain employment. The Local Initiatives Support Corporation released a recent report that showed that of 40,000 low-income clients seeking assistance from FOCs, 87% of whom are in the bottom fifth of US income distribution, of those who received bundled services, employment placement rates were 39% (compared with 22% for employment services alone), employment retention rates were 59% (compared with 45% for employment services alone), and 76% showed an increase in net income. (Our three FOCs were not included in this study, since they opened in 2015.)

We are happy to see that financial education is listed as an “allowable service” for adults in the WIOA legislation, and urge the PA State Plan to include additional services focused on building financial skills such as saving and budgeting, offering access to income supports such as tax credits or food assistance, and that lead to long-term growth in income and wealth.

Financial coaching, when bundled with employment assistance and public benefit counseling, has the potential to impact the following WIOA Performance Measures :

- Client's ability to stay in employment placement: FOC coaching helps clients stabilize other aspects of their financial lives – like housing, childcare and transportation – that can interfere with employment retention. Coaching also helps clients address sources of financial stress – like credit card debt – that can interfere with productivity and performance on the job.
- Client's ability to increase earnings: FOC coaching has been shown to have an impact on increasing earnings for participants that are financially vulnerable compared to control groups.
- Career Center's ability to serve employers: FOC coaching has the potential to reduce employees' financial stress and increase their productivity at work, benefitting both the employees' financial well-being and the employer's bottom line.

Response: We appreciate the information provided by the commenter and agree that financial coaching is a beneficial service.

- Pages 67-70 of the PA State Plan discusses “Priority of Service for Recipients of Public Assistance, Other Low-income Individuals, and Individuals who are Basic Skills Deficient,” and provides the requirement under WIOA Section 134(c)(3)(E) that the commonwealth, LWDBs, and PA CareerLink® centers shall provide priority for Title I individualized career services and training services to the following:
 - recipients of public assistance, defined as SNAP, TANF, SSI, or state or local income-based public assistance benefits;
 - low-income individuals, defined as those receiving public benefits, those with total family income lower than either the poverty line or 70% of the lower living standard income level, homeless, those eligible for free/reduce price lunch, foster child, and qualifying individuals with disabilities;
 - individuals who are basic skills deficient, defined as youth with skills below 8th-grade level or youth/adult unable to compute or solve problems, or read, write, or speak English at a level necessary to function in a job, family, or society.

Further, the plan requires that data are obtained reflecting the numbers of people served for each of these three categories, that outreach will be targeted to reach those potentially eligible, and that eligibility will be screened at point of entry. Once screened, eligible people will be assessed to identify barriers to employment and the services needed to address them.

We know from CFED's Assets & Opportunity Local Data Center that the liquid asset poverty rate for Pittsburgh is over 40%, and that there is a significant racial wealth divide. According to the University of Pittsburgh's Center on Race & Social Problems, 15% of Whites and 33% of Blacks live in poverty and 59% of Whites own homes, while only 34% of Blacks do. Unemployment between 2007-2011 averaged 7% for Whites and 17% for Blacks in the city.

Our Financial Opportunity Centers serve a majority of these priority-of-service recipients. Each center determines participants' status through an intake process that collects basic demographic data, assesses barriers to employment, screens participants' eligibility for public benefits, and assists them to access any relevant benefits.

In short, the Financial Opportunity Centers supported by Neighborhood Allies in Pittsburgh and Allegheny County serve a priority population for the WIOA legislation, and address challenges to employment and income through a bundled approach that has been proven to be successful. The PA Combined State Plan should address methods such as program integration and financial coaching for achieving the goals set out in WIOA.

Response: We appreciate the comments and encourage LWDBs to coordinate with programs such as the Financial Opportunity Centers as appropriate.

North Central Workforce Development Board offered the following comments:

- Training Benchmarks (WIOA Plan, pg. 10): Please consider setting broader benchmarks that actually encourage cross-program/cross-department integration and leveraged funding. This will ensure that individual program metrics and performance measures are not lost but rather recognized and aligned. For example, participants can be co-enrolled in Title I, Title II, Title IV, or EARN programs to name a few partners, all of which financially support adult, dislocated worker and youth participants in training and increasing employability skills; however the proposed minimum expenditure requirement for Title I puts the financial burden on Title I partners and doesn't account for the leveraged training resources of the Adult Education, Vocational Rehabilitation, EARN providers and other partners.

It is also recommended the following be considered with respect to Title I training expenditure goals:

- Include all allowable training activities under WIOA section 134 as well as work experience and internships in calculating training expenditures.
- Include training conducted under other funding, including but not limited to Trade Act, American Apprenticeship, H1-B, National Emergency Grants, Rapid Response, and National Dislocated Worker grant programs, to offset the training target.
- Encourage dual enrollment of the one-stop partners and include each partner's contribution.
- Include the cost of assessment and case management necessary for participants to enroll in and successfully complete training.
- Include the cost of registration, books, lab fees and other supportive services.
- Exclude the 10% administrative portion of Title I contracts when calculating the minimum training expenditures, mimicking how the 75% out-of-school youth minimum expenditure requirements are calculated.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets. We have also clarified that the 10 percent administrative funds will not be included when calculating training benchmarks.

- Priority of Service (WIOA Plan, pg. 67): Similar to the recommendations with regard to the training expenditure thresholds, it is respectfully submitted that the state considers the following clarifications with respect to “priority of service”:
 - Exclude dislocated workers as their eligibility is not based upon barriers.
 - Include those individuals who fit in the local board definition of not earning a “self-sufficient” wage as one of the barriers, or that these individuals be considered low income, thereby entitling them to a priority of service.
 - When evaluating a local board’s performance base it on outreach rather than enrollment. While you can inform the customer of options you can’t make them participate.

It is recommended that the state consider incorporating a waiver process for local boards that can justify a rationale for setting a lower goal than described in the state plan for training expenditures and services / training for individuals with barriers.

Response: We appreciate the comment and agree that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- Performance Measures: It is respectfully suggested that consideration be given to lowering the targets for the performance measures to the baseline met by the state during its last year of performance under the Workforce Investment Act, because states and local areas are still transitioning to WIOA and participants enrolled prior to publication of the measures will be included in the determination of the WIOA measures next year.

It is respectfully submitted that the state can set a lower baseline for performance in the plan while still encouraging and incentivizing local areas and regions to meet the Governor’s thresholds. In doing so, local areas and the state can strive toward the Governor’s goals without placing undue pressure and risk on the state and local system.

Response: WIOA presents many new performance measures and goals. For many, there is little or no baseline information. The targets as expressed in the plan represent a starting point for conversations among providers, partners, and policy-makers.

- Recognizing the Roles of State and Local Areas/Regions in the Plan – Allowing for flexibility and innovation: In enacting WIOA, Congress assigned roles to the states and to the local workforce

development boards. The responsibility of the state board can best be summed up by the language of WIOA § 101 (d)(12), which includes as a function of the State Board the responsibility to develop policies to promote statewide objectives and enhance the performance of the state workforce development system.

At the local level, pursuant to WIOA §107 (d), local elected officials together with the local boards are responsible for setting policies, approving how funds will be spent (the budget) and analyzing local conditions so they can make determinations on the type, mix and investments in services and training with their WIOA allocation.

It is respectfully submitted that the state consider the benefit of allowing local boards the nimbleness embedded in the law to be responsive to local area needs, which vary across the state by incorporating as much flexibility as possible into the various sections of the state plan and into the policies that will be adopted to implement WIOA. This will not only allow for local responsiveness but also encourages innovation which is core to the legislation. Examples of where the plan is “getting into the weeds” can be found on the following pages: 16, 17, and 29.

Response: We appreciate the comment and note that the State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved.

- Mandatory funding for Industry Partnerships: “The commonwealth will specifically require LWDBs to provide funding to Industry Partnerships and other multi-employer workforce intermediaries that serve employers with common skill needs in their local workforce areas.”

While the North Central WDB fully supports Industry Partnerships and has managed both the Manufacturing and Health Care IPs for many years we don’t have the resources to fund these initiatives; especially if the mandated training requirements for individuals meeting priority of service are maintained (first point above).

We think it is critical to maintain sector partnerships as outlined in the legislation but need additional state funds to support these efforts in order to be successful and remain important to our employers.

Response: The commonwealth envisions Industry Partnerships as a state/local partnership and therefore expect local financial support of IPs.

- PWDP: “Non-Discrimination and Accessibility”
Q: The Commonwealth Methods of Administration (MOA) as mentioned, when was the latest MOA implemented and for what time period? Is an email version available for the LWDAs?

Response: The MOA was last updated in 2014. A link to the current MOA is included in the Assurances section of the State Plan.

- PWDP: “In collaboration with one or more centers for Independent Living and the Office of Deaf and Hard of Hearing, the Commonwealth will evaluate the physical accessibility of all PA CareerLink® offices and services annually to ensure that Pennsylvanians with a disability are able to fully avail themselves of PA CareerLink® services.”

Q: When will the first annual evaluations as such for the PA CareerLink® centers commence and who specifically will do the reviews?

Q: Will the Commonwealth provide, to the individual PA CareerLink® center, a Monitoring Questionnaire that must be completed and submitted to the Commonwealth by the Site Administrator prior to the actual review commencing?

Response: Physical and programmatic accessibility evaluation is part of the PA CareerLink® certification and continuous improvement process which must be conducted at least once every three years. It has not yet been determined when such evaluation will commence, however, it has been recommended that the Department require only a 1-year initial WIOA one-stop system certification be conducted prior to June 30, 2016, to be followed by a 2-year recertification process to be completed by June 30, 2017. Both initial and subsequent PA CareerLink® certifications must include an evaluation of the physical accessibility of all PA CareerLink® offices and services. Department guidance is being developed which will address the PA CareerLink® certification process in detail.

- PWDP: “PA CareerLink® staff members receive refresher Training on disability awareness, sensitivity and etiquette, outreach for employers and guidance concerning Social Security and related topics. Each office is required to develop an Enhancement Plan for providing services to persons with disabilities”.

Q: To ensure the Enhancement Plans are consistent in text, will the Bureau provide the PA CareerLink® centers instruction and/or a template to follow?

Q: Will the individual PA CareerLink® center be required to submit the Enhancement Plan to the Bureau for their review?

Q: Are individual “Affiliate” PA CareerLink® centers required to have their own Enhancement Plan?

Q: Will the individual PA CareerLink® center be required to provide the LWDB with the Enhancement Plan approved compliant by the Bureau?

Q: What will be the longevity of Enhancement Plans?

Response: The commonwealth is currently developing guidance with regard to certifying each of the PA CareerLink® centers.

- PWDP: “The Division of Adult Education requires all Title II programs to be ADA compliant and mandates that programs have reasonable materials available for students to use to accommodate learning differences.”

Q: Will the Division of Adult Education conduct ADA Monitoring Reviews to ensure applicable compliance?

Q: What all is considered “reasonable materials”? Providing LWDAs with a listing of the materials needed to be available would be helpful and ensure consistency.

Response: The Division of Adult Education reviews ADA compliance during its overall onsite monitoring visits. Guidance on reasonable materials is available on the Pennsylvania Adult Education Resources website.

- PWDP: “Working in close partnership with the LWIA, along with PA CareerLinks and LWDBs, RRCS developed an outplacement curriculum delivered to affected workers that uses comprehensive, customizable workshops and a proven “Surviving a Layoff” publication.”

Q: Is an email version of the publication available for the LWDAs? If so, where?

Response: An email version of "Surviving a Layoff" publication is currently not available. However, the Rapid Response staff in the respective local areas can provide a copy of the publication upon request.

- PWDP: “The Commonwealth is in the process of establishing a State Office of Apprenticeship Training (OAT)”. A specific “Point of Contact” as such will be most helpful and is greatly appreciated by Business Service Team staff.

Q: When do you anticipate the OAT will be in place and operational?

Response: The OAT was operational effective February 9, 2016. Eric Ramsay is the Director of the Office of Apprenticeship Training.

- PWDP: “Every local workforce development board will be required to have a youth standing committee ...”.

C: Under the WIA the Youth Councils were very beneficial to the successful implementation of services to Youth. The WIOA Youth Standing Committee for the Local Areas is most welcome and appreciated because of the previous Youth Council’s input.

Response: We are pleased that the commenter supports this requirement and agree that standing Youth committees are integral to the successful provision of Youth services.

- PWDP: “...Local boards will establish criteria to ensure that newer provider entities with less professional experience in the provision of youth services are afforded the opportunity to compete with more established providers for a contract. Criteria will also be established and included in contracts that outline the right of the local board to terminate a provider’s contract for cause, such as fraud or failure to meet established performance standards.”

Q: To ensure the contracts are consistent in text, will the Bureau provide the LWDAs a template to follow?

Response: We appreciate the comment but it is not relevant to the state plan. The Department does not intend to provide a template with regard to such contracts.

- PWDP: "...the Commonwealth is designing a paid summer internship program for disadvantaged youth ages 16-18. This 8-week program will kickoff during the summer of 2016. Multiple state agencies and offices, including PA CareerLink® centers, will serve as worksites providing opportunities for valuable work experiences, with a strong focus on "soft skills" to area youth. State staff will act as supervisors/mentors for youth participants."

C: A Youth Program as such is greatly appreciated. Within our local area, at PA CareerLink® centers, our Workforce Development Youth Case Managers have/do provide "Work Experiences" to youth. The Youth Counselor acts as the "Lead" Supervisor/Mentor. This activity has proven to be very beneficial to participating youth. The proposed "State 2016 Summer Internship Program" is certainly welcome, especially for disadvantaged youth this age group.

Response: We are pleased that the commenter supports the proposed Summer Internship Program.

- PWDP: "The Department of Labor & Industry is the lead agency in the development of the internship program framework, which includes the development of training plans, the recruitment process for eligible youth, and the assignment of youth to worksite rotations based on identified areas of interest."

C: We are anxious to review the text of the "Training Plans" and review the recruitment process that will be required.

Q: Will the LWDAs be required to have an executed "Worksite Agreement" in place for each Summer Internship Program Worksite?

Q: If "yes", ...to ensure the "Worksite Agreements" are consistent in text, will the Bureau provide the LWDAs with instruction and a template to follow? Will it include PII?

Response: We appreciate the comments and questions related to Pennsylvania's Summer Internship Program for Youth (PA SIP). The details surrounding this program, in preparation for summer 2016, are currently still under development. However, we have developed a "Training Plan Template" document that will be used by the designated supervisors (commonwealth staff) at each of the PA SIP internship sites around the commonwealth to plan for the day-to day activities of the intern(s) assigned to that office. LWDA staff affiliated with any of the PA SIP field sites may also request this template from BWDA or BWPO for review. The recruitment process for PA SIP is being coordinated at the state-level through the PA Department of Education (PDE), who will work with school administrators around the commonwealth to identify and nominate a specified number of students for the limited number of available program slots. Worksite Agreements are one of the possible program framework elements that the Department is

already in the process of discussing. LWDA's will be certainly be notified should they be required to be a party to such an agreement.

Courtney Fasnacht, **Northeast PA Manufacturers and Employers Council, Inc.**, submitted the following comments:

- **Training Expenditures:** While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- **Priority of Service Benchmarks:** Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- **PA CareerLink® – Online Services as an Enhancement:** PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self-service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that

do not yet have broadband available. Online services cannot replace face-to-face career coaching and mentoring as well as the many other hands-on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

Northeast Pennsylvania Manufacturers and Employers Association submitted the following comments:

- **Training Expenditures:** While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy.

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Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- **PA CareerLink® – Online Services as an Enhancement:** PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self-service options both inside and outside of PA CareerLinks® is of value in today’s increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face-to-face career coaching and mentoring as well as the many other hands-on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

John Feraco, **Nova Chemical and SW Corner Workforce Development Board member**, submitted the following comments:

- **Training Expenditures:** While there is certainly value to upskilling the commonwealth’s workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area’s federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- **Priority of Service Benchmarks:** Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to

address the needs in their communities while giving priority to those with barriers as the law requires.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- PA CareerLink® – Online Services as an Enhancement: PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self-service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face-to-face career coaching and mentoring as well as the many other hands-on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

Jen Agosti, **Nurse Sharks, Inc.**, offered the following comments:

- Training Benchmarks (p. 10: State will establish benchmarks for how much WIOA Title 1 funding must be used for training by local areas): While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- Priority of Service Benchmarks (p. 68: State will monitor data reported to determine the percentage of those served who are individuals with priority of service and barriers to employment): Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. This will have a significant impact on the local area's ability to meet the critical needs of dislocated workers from Joy Mining, General Electric Transportation Services (GETS), and other employers that are experiencing reductions in the workforce.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- Transitional Jobs (p. 70: Local Workforce Development Boards will be required to use between 5-10% of Title 1 funds to provide transitional jobs and ensure that priority of service for transitional jobs is afforded to individuals who qualify) :NW PA WDB applied and received funding from the Workforce Innovation Fund (WIF) federal grant program to target the population described in this section of the State plan as priority of service. The requirement to spend Title 1 funds for this group will negatively impact the ability of staff to meet the goals of the federal program. Flexibility in the state plan for the local board to determine how or what funds are used to meet the requirements is advised. Additionally, the need to get approval from the commonwealth to transfer funds from Title 1-B funds from Adult to the Dislocated Worker Program will negatively impact our ability to be responsive to the needs of dislocated workers in the area such as GETS and Joy Mining.

Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs. Regarding transfer of Title I funds, the commonwealth will review requests to transfer funds as quickly as possible to ensure service delivery is not disrupted.

- Employer Services (p. 24-25) (p.67) and throughout the plan: A definition of High Quality Jobs is necessary to determine the focus of employer services. Recognizing that many of the openings are low end and replacement for turnover and not going deeper into the data is a concern. There are many job seekers that do not have the skills for a higher level position and employers that need to fill these positions in order to vet a new employee that may move up a career pathway/ladder. Also this is cause for concern in prioritizing employers for services that they

are begging to have.

The plan, in general, does not cover many employer services. The focus is on the funding which follows the job seeker and is targeted (70%) to those with barriers to employment and prioritizes three areas 1) recipients of public assistance 2) other low income individuals and 3) individuals who are basic skills deficient.

Response: We appreciate the comment and recognize some subjectiveness in the term "high-quality jobs," although the plan outlines characteristics of high quality jobs (reasonable wages, benefits, full-time stable employment, advancement opportunities, etc.) in the introductory language under Goal 4. While the State Plan emphasizes and encourages high-quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high-quality jobs. We also agree with the commenter that the workforce development system can only be successful if it is responsive to the needs of employers. Goal 2 focuses on developing a pipeline of workers to meet industry needs and Goal 4 speaks to engaging employers and being responsive to their needs.

- Data Collection (p. 18 comments 5.1 through 5.7) ROI & Market Penetration (p. 32 table): While we recognize the importance to protecting data, as a local partner the WDB will need to utilize the information to make local decisions that are not necessarily interesting to the commonwealth. The state plan does not clarify what access the local board will have to the data. In addition the definition for ROI and Market Penetration are not clear. If employers are not eligible because they do not qualify for services due to high turnover or low wages (p. 29) it will be impossible to meet the imposed requirements. We encourage the commonwealth to share the raw data with the local areas so that improvements in the system can be made.

Response: The commonwealth must ensure the integrity and security of data among all partners and programs. As the volume and diversity of workforce data grows, so too do the opportunities and challenges of sharing information among all involved. We are committed to expanding access within the parameters outlined by statutes, regulations, and policies that govern the release of this data. Additional clarity for the ROI and market penetration measures will be provided once final WIOA regulations are released.

- High Priority Occupations (HPO) List and High Turnover Positions (p. 24-25): It is admirable that the commonwealth wants to reduce the high turnover rates and focus on retention, but without a change in the method for developing the HPO list it will be nearly impossible. Given the principle of consumer choice used at the PA CareerLinks® it is unlikely that we will experience a reduction in the number of individuals requesting training that is on the HPO list to focus on positions where the turnover is low.

Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent

modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned.

- Workforce Development System-Alignment Strategy (p. 29): This is an area that can be improved in the PA CareerLinks® and I am pleased to see that the commonwealth recognizes the need. Each partner in the PA CareerLinks® should be willing to serve each client that enters and share the information with all professionals employed in the site.

Response: We appreciate the comment in support of this effort.

The **Northwest Workforce Development Area Chief Elected Officials** submitted the following comments:

As you receive public comment on Pennsylvania's WIOA Combined State Plan 2016-2020, we urge the Department to address the following issues that could impact service delivery in our area. In general, we are requesting the commonwealth consider three areas of the plan autonomy so that the local board and elected officials have the ability to meet the needs of the local job seekers and employers, liberal definitions for training and priority of service, and more support for employers in the commonwealth. Autonomy will provide the local board the ability to meet the spirit of the federal law, WIOA, when making decisions while meeting the needs of local job seekers and employers. Finally, employers seem to be missing from the commonwealth's plan with the exception of Industry Partnerships and High Quality Jobs that appears to mean that local boards will be required to prioritize services to employers with higher paying jobs.

- Training Benchmarks: The prescriptive spending requirements in the commonwealth's plan, in excess of the requirements in WIOA, limits the local board's and elected officials' ability to respond to customer's needs. In addition, the requirements will limit the funds available for important services to job seekers and employers unless the definition of training is broad enough to include one-on-one assistance to job seekers that have barriers to employment. These are the very clients that are targeted in priority of service. The requirement will also limit the funding available for business services and industry partnerships. Industry partnerships were not funded in the region (eight counties of northwest Pennsylvania) leaving the Title I dollars to fund the continuation.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- Priority of Service Benchmarks: WIOA clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and

other obstacles. The 70% threshold is intrusive of the ability of the local board and elected officials to determine how best to meet the needs of local customers. We have critical needs to assist recently dislocated workers at companies like Joy Mining and General Electric Transportation Systems and these individuals would not qualify for the threshold. It is important that boards remain autonomous to meet the needs of the local area. In addition, the disconnect between working with individuals with barriers and the service that is needed to effectively assist them while meeting the expectation of training is very real.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- The term High Quality Jobs is concerning as it appears to mean that those employers that are not providing a high wage or have high turnover in entry level positions will not receive a high priority of service. In our area we are experiencing significant layoffs for various reasons in some of our highest paid positions with few equal replacements for the dislocated worker. While we agree that the effort needs to focus on family sustaining wages and employers that are willing to work with job seekers that are of a varied background; we must be realistic in that most of the job seekers that are being prioritized will only obtain skills to provide them an entry level position with many of our local employers. We are taking this seriously in that we have taken steps to begin to diversify the regional economy and encourage entrepreneurship. The flexibility to do what is needed locally should be encouraged in the commonwealth's plan for areas/regions that continue to meet the spirit of WIOA.

Response: Focusing limited workforce development resources to employers offering high quality jobs is a priority of the Governor. While the State Plan emphasizes and encourages high-quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high-quality jobs.

The **Northwest Workforce Development Board** submitted the following comments:

- **Training Benchmarks:** The NW WDB is aggressively moving to a service model that will reduce Title I dollars for infrastructure. As this model is being developed, the NW WDB embraces moving more Title I funding into training and industry partnerships provided the training meets the needs of local employers while achieving performance measures. Clarity around what is considered training (ITAs, OJTs, Title II, Dislocated Worker, RR, etc.) will be helpful in the development of our regional and local plans. The exclusion of dislocated workers and enforcement of priority of service could be problematic at this time. Recent layoffs at General Electric Transportation Systems and Joy Global have created a significant influx of dislocated workers in the PA CareerLink(R) offices. The plan does not specifically address the needs of

dislocated workers and the priority of getting them back to work. It is our expectation that a broad definition of training will be included.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- Employer Services and Industry Partnerships: Definitions around Quality Entry Level Jobs, High Quality Jobs, the Right Employers, and Industry Partnerships require clarification. In order to engage employers on the local WDBs and the Industry Partnerships, the commonwealth's plan must be inclusive and not exclusive. It appears that these terms are for selecting certain employers and limiting business services to some employers. Industry partnerships are discussed throughout the plan and in some sections it appears they are to be funded by the WDBs and in other sections (p. 47) it appears the commonwealth will fund them. Please provide clarity on these four terms.

Response: We appreciate the comment and recognize some subjectiveness in the term "high-quality jobs," although the plan outlines characteristics of high quality jobs (reasonable wages, benefits, full-time stable employment, advancement opportunities, etc.) in the introductory language under Goal 4. Focusing limited workforce development resources to employers offering high quality jobs is a priority of the Governor. While the State Plan emphasizes and encourages high-quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high-quality jobs. Regarding Industry Partnerships, the state believes funding support for IPs must be a combination of state and local resources.

- Strengthening Data and Sharing: We support strengthening the data collection provided that the data is shared with the local WDBs to the extent allowed by federal law. Confidentiality in the WDB is common practice. Sharing data with the WDBs would provide the system an opportunity to respond quickly to the needs of the local area. It is requested that the commonwealth amend the state plan to include the sharing of information.

Response: The commonwealth is committed to providing access to data in a manner consistent with the statutes, regulations, and policies governing its release.

- WIOA section 107(d) states, local elected officials together with the local boards are responsible for setting policies, approving how funds will be spent, and analyzing local conditions so they can make informed determinations on the type, mix and investments in services and training with their WIOA allocations. It is respectfully submitted that the commonwealth consider the benefit of allowing local boards the flexibility to be responsive to the local area needs.

Response: We appreciate the comment and note that the State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved.

The **Oil Region Alliance of Business, Industry & Tourism** submitted the following comments:

- Training Benchmarks (p. 10: State will establish benchmarks for how much WIOA Title 1 funding must be used for training by local areas): While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- Priority of Service Benchmarks (p. 68: State will monitor data reported to determine the percentage of those served who are individuals with priority of service and barriers to employment): Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. This will have a significant impact on the local area's ability to meet the critical needs of dislocated workers from Joy Mining, General Electric Transportation Services (GETS), and other employers that are experiencing reductions in the workforce.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- Transitional Jobs (p. 70: Local Workforce Development Boards will be required to use between 5-10% of Title 1 funds to provide transitional jobs and ensure that priority of service for

transitional jobs is afforded to individuals who qualify): NW PA WDB applied and received funding from the Workforce Innovation Fund (WIF) federal grant program to target the population described in this section of the State plan as priority of service. The requirement to spend Title 1 funds for this group will negatively impact the ability of staff to meet the goals of the federal program. Flexibility in the state plan for the local board to determine how or what funds are used to meet the requirements is advised. Additionally, the need to get approval from the commonwealth to transfer funds from Title 1-B funds from Adult to the Dislocated Worker Program will negatively impact our ability to be responsive to the needs of dislocated workers in the area such as GETS and Joy Mining.

Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs. Regarding transfer of Title I funds, the commonwealth will review requests to transfer funds as quickly as possible to ensure service delivery is not disrupted.

- Employer Services (p. 24-25) (p.67) and throughout the plan: A definition of High Quality Jobs is necessary to determine the focus of employer services. Recognizing that many of the openings are low end and replacement for turnover and not going deeper into the data is a concern. There are many job seekers that do not have the skills for a higher level position and employers that need to fill these positions in order to vet a new employee that may move up a career pathway/ladder. Also this is cause for concern in prioritizing employers for services that they are begging to have.

The plan, in general, does not cover many employer services. The focus is on the funding which follows the job seeker and is targeted (70%) to those with barriers to employment and prioritizes three areas 1) recipients of public assistance 2) other low income individuals and 3) individuals who are basic skills deficient.

Response: We appreciate the comment and recognize some subjectiveness in the term "high-quality jobs," although the plan outlines characteristics of high quality jobs (reasonable wages, benefits, full-time stable employment, advancement opportunities, etc.) in the introductory language under Goal 4. While the State Plan emphasizes and encourages high-quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high-quality jobs. We also agree with the commenter that the workforce development system can only be successful if it is responsive to the needs of employers. Goal 2 focuses on developing a pipeline of workers to meet industry needs and Goal 4 speaks to engaging employers and being responsive to their needs.

- Data Collection (p. 18 comments 5.1 through 5.7) ROI & Market Penetration (p. 32 table): While we recognize the importance to protecting data, as a local partner the WDB will need to utilize the information to make local decisions that are not necessarily interesting to the commonwealth. The state plan does not clarify what access the local board will have to the

data. In addition the definition for ROI and Market Penetration are not clear. If employers are not eligible because they do not qualify for services due to high turnover or low wages (p. 29) it will be impossible to meet the imposed requirements. We encourage the commonwealth to share the raw data with the local areas so that improvements in the system can be made.

Response: The commonwealth must ensure the integrity and security of data among all partners and programs. As the volume and diversity of workforce data grows, so too do the opportunities and challenges of sharing information among all involved. We are committed to expanding access within the parameters outlined by statutes, regulations, and policies that govern the release of this data. Additional clarity for the ROI and market penetration measures will be provided once final WIOA regulations are released.

- High Priority Occupations (HPO) List and High Turnover Positions (p. 24-25): It is admirable that the commonwealth wants to reduce the high turnover rates and focus on retention, but without a change in the method for developing the HPO list it will be nearly impossible. Given the principle of consumer choice used at the PA CareerLinks® it is unlikely that we will experience a reduction in the number of individuals requesting training that is on the HPO list to focus on positions where the turnover is low.

Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned.

- Workforce Development System-Alignment Strategy (p. 29): This is an area that can be improved in the PA CareerLinks® and I am pleased to see that the commonwealth recognizes the need. Each partner in the PA CareerLinks® should be willing to serve each client that enters and share the information with all professionals employed in the site.

Response: We appreciate the comment in support of this effort.

Community Legal Services and the Community Justice Project on behalf of **Success Against All Odds (SAO) and Just Harvest** submitted the following comments:

Enclosed are comments from Community Legal Services and the Community Justice Project on behalf of Success Against All Odds (SAO) and Just Harvest in strong support of Pennsylvania's proposed WIOA State Plan.

Success Against All Odds is a statewide organization of current and former recipients of Temporary Assistance for Needy Families (TANF) and/or the Supplemental Nutrition Assistance Program (SNAP) who are seeking to achieve or have achieved economic independence by pursuing Community College

degree and certificate programs preparing them for jobs in High Priority Occupations. Just Harvest is a non-profit organization in Pittsburgh that engages in advocacy to end hunger and poverty. Their work includes connecting families with public assistance programs, which among other supports, can provide access to education and training.

Our comments focus on: (i) WIOA's priority of service for recipients of public assistance and other low-income persons; (ii) Career Pathways; and (iii) Transitional Employment. In our comments, we give the Department very high grades for the very specific requirements and guidance provided in these areas of critical importance to low-income families. We urge you to retain these provisions in the final WIOA State Plan.

Please note that our comments are supported by two statewide coalitions that advocate for low-income families, including families receiving public assistance: the Coalition for Low-Income Pennsylvanians (CLIP) and the Making Work Pay PA coalition.

The Coalition for Low Income Pennsylvanians (CLIP) is a group of 34 diverse organizations from across Pennsylvania including the faith community, service providers, legal service advocates, anti-poverty and anti-hunger groups, children's advocacy organizations and community action agencies. CLIP's primary mission is to protect individuals and families who struggle against the ravages of poverty by advocating for responsible, compassionate, and cost-effective government policies.

The Making Work Pay PA Coalition is a statewide group of advocacy and direct service organizations that have come together to develop recommendations for measures that government can implement to better ensure that low-income families are always better off when parents go to work, work more hours, or earn promotions or raises.

Together these coalitions speak for the following organizations across the Commonwealth:

ACHIEVEability * Americans for Democracy in Action * Bucks County Women's Advocacy Coalition
Career Wardrobe * Center for Hunger-Free Communities at Drexel University
Coalition of 100 Black Women, Inc.- Pennsylvania Chapter * Community Action Association of PA
Community Justice Project * Community Legal Services, Inc.
Delaware Valley Association for the Education of Young Children National
Housing Alliance of Pennsylvania * JEVS Human Services * Just Harvest
Lutheran Advocacy Ministry in PA * Maternity Care Coalition * PA Budget & Policy Center
PA Catholic Conference * PA Coalition Against Domestic Violence * PA Coalition Against Rape
PA Council of Churches * PA Hunger Action Center * PA Jewish Coalition
PA NOW * PA Prison Society * PathWays PA
People's Emergency Center * Phila Unemployment Project (PUP)
Philadelphia Workforce Development Corp. * Planned Parenthood Southeastern PA
Public Citizens for Children & Youth * SEIU 668 PSSU * United Methodist Advocacy in PA
United Way of Pennsylvania * Unitarian Universalist PA Legislative Advocacy Network (UUPLAN)

Response: We appreciate the comments in support of the plan.

Pam Brauchli, **Office of Vocational Rehabilitation**, offered the following comments:

- This is not an easy document to read. It would help if the names of the core partners in the plan were clearly titled in the table of contents as well as the beginning of each new section.

Response: We appreciate the comment.

- Several charts and graphs appear in this document. Did you check their accessibility to people using screen readers?

Response: States will be required to submit a Unified or Combined State Plan through an online submission system developed by the Department of Education's Rehabilitation Services Administration (RSA). The system features a web-based portal that allows users to enter data and text in response to the Unified or Combined State Plan elements, is 508 compliant, and allows for public posting of approved plans.

- WIOA Adult – Does this program include services to Individuals with Disabilities (IWD)?

Response: The WIOA Adult program does serve individuals with disabilities who meet program eligibility requirements.

- Wagner-Peyser - Does this program include services to IWD?

Response: The Wagner-Peyser program does serve individuals with disabilities.

- OVR - This section is misleading. Although it uses the word eligible, it's easy to miss. This section makes it sound as though OVR serves all IWD. It should be made clear that IWD who are not eligible for OVR services can be served by the other partners.

Response: We appreciate the comment but feel the section is clear that OVR services may only be provided to eligible individuals.

- Assessment – It isn't clear how they conduct their assessments. Do they conduct customer satisfaction surveys? Do people have informed choice or appeal rights?

Response: We appreciate the comment. WIOA identifies the common performance measures that are required by the six core programs.

- “The Pennsylvania WDB has established a standing committee to consider Performance and Accountability.” – They should include performance and accountability regarding the provision of physical and programmatic accessibility to IWD.

Response: The Performance and Accountability Committee of the PA Workforce Development Board is open to consideration of all metrics and ways to improve service delivery.

- Non-Discrimination and Accessibility – This section should include performance and accountability regarding the provision of physical and programmatic accessibility for IWD. What happens if IWD believe they have been discriminated against? What recourse do they have?

Response: The referenced section of the State Plan provides a collective and thorough response to the questions that must be addressed therein, with specific regard to accessibility for individuals with disabilities. While performance accountability does have elements of connectivity to this section, such detail may be found in the Department’s PA Workforce Delivery System Policy.

- “PA CareerLink® staff members receive refresher training on disability awareness, sensitivity and etiquette, outreach for employers and guidance concerning Social Security and related topics. Each office is required to develop an Enhancement Plan for providing services to persons with disabilities.” – Can people request a copy of this plan?

Response: We appreciate the comment. Individuals interested in receiving a copy of an Enhancement Plan are encouraged to contact the site administrator of the PA CareerLink® to make such a request.

- These statistics go back to 2011. Do they have anything from the last completed calendar year, i.e. 2014?

Response: DHS has provided more recent statistics in the final submission of the plan.

Julia Barol of **PA APSE** offered multiple comments to include:

- Goal 2, page 10: While working towards “family sustaining wages” is a priority, it must be noted that not all individuals with significant disabilities may have the ability to earn at this level and we would like to see “increasing wages” as a goal as well.

Response: We appreciate the comment and note that in Goal 1.7 and elsewhere in the plan, we encourage placement of individuals with barriers to employment into quality entry level jobs that provide work experience and non-technical skills necessary to lead to employment in jobs that pay family sustaining wages.

- Coordination, Alignment and Provision of Services to Employers, Page 50: We are concerned when you write: “All Pennsylvanians exiting basic education services, both through the traditional K-12 system and through adult basic education, will be prepared to participate successfully in postsecondary level instruction with no need for remediation. To support this vision, Title II adult basic education providers are implementing the College and Career Readiness Standards for Adult Education...Students who do not earn a high enough score on placement tests at the postsecondary institution are referred to a local adult basic education program for remedial work. After the student has demonstrated sufficient academic progress at the local adult education program, as determined by an approved standardized test, the student is referred back to the postsecondary institution. “ There must be a provision for students who are in special education who may not pass standardized tests. The development of training programs to get youth with significant disabilities ‘ready’ for work is something that we are moving away from as decades of experience has shown that this doesn’t work (see PA APSE White Paper on Employment). We respectfully suggest that wording be included to create accommodations for those students that may not meet the qualifications presented above.

Response: The statement referred to in the comment is specifically addressing the role of Title II adult basic education programs in supporting students in those programs to successfully participate in postsecondary education/training. The commonwealth recognizes that students who are in special education may require accommodations.

- Distribution of Funds for Core Programs, Pg. 59:
 - In relations to youth with mental health disabilities: are there funds allocated to support their continuum of recovery to follow them from school to work?
 - Since there are such significant financial implications, provide clear definitions for terms like “youth” and “graduation” and use consistently throughout. Both the definitions and the attached delineations of funds available are confusing. To avoid confusion about roles and responsibilities and availability of resources, clarify the terms and the roles and responsibilities of each service system. We need to actively provide support to youth still in school. This is when most youth without disabilities should start their working lives. We must ensure that definitions are clear and precise to provide the best outcomes possible for transition age youth.

Response: The allocation of funds described is specific to WIOA Title I Youth funds. While funds are not allocated to youth with mental health disabilities specifically, those youth could be eligible to receive Youth services if they are otherwise eligible. We also appreciate the comment around definitions and support the need to clarify terms and the roles and responsibilities of each service system, which will be done through program specific policies. Unfortunately, some definitions differ depending upon the program making it difficult to provide across the board definitions in the state plan.

- Page 85: In the definition of ‘youth standing committee’ there needs to be specific mention of the inclusion of professionals with experience in the transition of youth with disabilities from school to work.

Response: The make-up of Youth Standing Committees is up to each local Workforce Development Board. We agree with the commenter that professionals experienced in the

transition of youth with disabilities from school to work would be valuable assets to Youth Standing Committees.

- Page 87: when referencing “disadvantaged youth,” does this include youth with disabilities? Recommend adding wording to include youth with disabilities.

Response: We accept the comment and will make a change to page 86 to include a specific reference to youth with disabilities.

- Request for Waiver of Statewideness, Pg.113: There are two interagency agreements highlighted in this section as new projects with the goal of replication throughout the state. As this is a four year plan we would like to see a target for additional sites in the state.

Response: We appreciate the comment. We will consider additional interagency agreements in the future, depending on available resources.

- State Goals and Priorities, page 135:
 - The goals appear to be out of order and should be changed by age and priority.
 - Goal 2 should be first, then Goal 1. Goal 2, number 5 should include “implementation of the research of best practices of peer mentoring as part of the four year plan.

Response: We appreciate the comment but do not feel the Plan needs to be altered as suggested.

- State’s strategies, pages 140 – 150:
 - The PETS needs to have “provision of the above services will result in reaching students earlier” defined. At what age will this begin for students?
 - The Plan should detail timelines of supports to be provided for transition age youth.
 - OVR needs to commit to working with transition age youth at a minimum of 2 years prior to exit of school and this needs to be state in the plan. Students in special education oftentimes decide not to stay until 21 and are unprepared when they leave school early. Ideally the last day of school should look like the first day past graduation and in order to have a seamless transition from school to work. This means that appropriate employment should be identified while the student is still in school. The collaboration between OVR and PDE doesn’t exist if this is not the goal.
 - Braided and blended funding options must be a part of the plan so that the student does not suffer from bureaucratic disagreements on payer of last resort.
 - Adult training facilities have no place in both assessment and volunteer/work opportunities while in school or post-school transition. These need to be faded out as part of the OVR plan.
 - OVR’s Early Reach initiative needs to be expanded to meet the needs of youth with disabilities. There are too few counselors currently. There needs to be additional training of counselors and on-going training of evidence based practice to inform/educate youth and families on the process of transition.
 - Build the capacity of PA’s employment professionals to support people with the most significant disabilities and to address barriers to employment which are related to misunderstandings about the relationship between SSA benefits and working. OVR

counselors and CRPs must have a basic understanding of the fundamentals of work and benefits.

- Support to encourage more CRPs to hire and train Community Work Incentive Counselors (CWICS) is desperately needed to help overcome barriers to employment. There are CRPs currently in PA that have committed to in house CWICs and should be used as a model for other CRPs in PA.
- There should be specific training required of CRP to build capacity of employment specialists to be successful in obtaining and maintain employment for people with disabilities
- Consider during this transition period for CRP's and agencies to sponsor and pay for training; make training mandatory for CRPs
- When providing employment services, there is no failure for a person. If the person is not successful then we, as professionals, haven't figured it out yet. For this reason, training in evidence based practice is so important.
- We request that OVR's SE policy that is currently in revision to reflect the new WIOA regulations to be put out for public comment.

Response: We appreciate the comments. Updates in the Rehabilitation Act of 1973 as amended in WIOA prioritize "Pre-Employment Transition Services" for students with disabilities ages 14 - 21. OVR has expanded its service definitions to include "Pre-Employment Transition Services" that will help direct individuals with disabilities who are still in high school into more competitive, integrated forms of employment. OVR will consider braided and blended funding options to further innovative collaboration efforts between OVR and PDE. We appreciate the comment on adult training facilities and note that under WIOA a young person will not be referred to a sheltered workshop without having the opportunity to access career counseling and employment services first. We also note per the last comment that OVR's Draft Supported Employment Policy is planned to be released for public comment in Spring 2016.

- Overall recommendations:
 - Commit to training that is consistent across all the various departments; same philosophy, same process, same implementation while remembering one program doesn't fit all.
 - The document should maintain a holistic approach which is intrinsic to collaboration and necessary for the success for people with disabilities. This holistic approach needs to be reflected across agencies/providers.
 - Make sure all trainings and materials are fully accessible for people with disabilities.
 - The use of the Hiram G. Andrews Center should be used across all state agencies for training. This way the center will not be a segregated setting and financial support of the center can be spread out across state agencies and thereby free up additional dollars for OVR services. Thank you for the opportunity to comment on the combined state plan. We have also attached a white paper on employment that further expands on areas of focus for Pennsylvania as it moves towards Employment 1st for people with disabilities.

Response: We appreciate the recommendations and will discuss them in our regular interagency work group meetings.

The **PA Commission for Community Colleges** offered multiple comments to include:

- The Pennsylvania Commission for Community Colleges (Commission) submits the following comments on Pennsylvania's proposed Workforce Innovation and Opportunity Act (WIOA) Combined State Plan (State Plan). As the representative for Pennsylvania's fourteen public community colleges established under Article XIX-A of the Public School Code of 1949, the Commission has specific interest in the Commonwealth's workforce system, and the impact of state policy on our member colleges. As such, the Commission offers the following comments on the proposed State Plan. The Commission's membership – Pennsylvania fourteen public community colleges – are a key component of the Commonwealth's education and workforce systems, having served more than 313,000 students statewide in FY 14-15. The Commonwealth should utilize the significant experience of the colleges in serving the targeted populations with career programming, job placement services for graduates, internships, practicums, and clinical experience for career programs, and working with employers on a local and statewide basis to improve the state's workforce system.

Response: The commonwealth appreciates this comment and looks forward to working with the community colleges in carrying out the state plan. The community colleges are a key element in the workforce development system in the commonwealth, as is evidenced by the number of initiatives that are referenced in the plan that include community colleges as partners.

- Inclusion of Perkins in the State Plan: The Commission recommends excluding Perkins from the State Plan. The benefit of including Perkins in the State Plan is unclear, and any benefit would be greatly outweighed by potential setbacks. In addition to the increased bureaucratic hindrances that could occur, combining Perkins with the WIOA could result in a decrease of funds available to postsecondary Perkins providers such as community colleges. Pennsylvania's community colleges have a longstanding history of managing Perkins funds effectively to link education, course alignment, and training to workforce needs. Working collaboratively with the Pennsylvania Department of Education, the colleges have developed extensive expertise in to successfully serve the students and clients of the workforce system. It is unclear what the benefits would be achieved by restructuring this high functioning portion of the Commonwealth's workforce system. Additionally, the demand for Perkins services already exceeds what the existing appropriation can support. Any diversion of funds to new overhead and/or administrative costs will harm the students and clients of the system. Additionally, the Commission and the members it represents have a strong working relationship with the Pennsylvania Department of Education (PDE) in regards to the use of Perkins funds. As such, there is reason to question the incorporation of this academic and career development support structure into the WIOA plan. Finally, because the Perkins program is currently being considered for reauthorization by the U.S. Congress, including the Perkins in the Commonwealth's WIOA plan might result in increased compliance difficulties upon reauthorization. If the Commonwealth would unfortunately proceed with the integration of Perkins within the State Plan, the following issues should be clearly defined:
 - How will these changes impact the Perkins Career and Technical Education program?
 - Will educational institutions receiving Perkins funds be required to use part of their Perkins allocation toward WIB services?
 - Will institutions be restricted in how they use their Perkins funds, i.e. specific programs or activities?
 - Will development of career pathways be a requirement for Perkins funding?

- Are there specific industry sectors that will need targeting for career pathways?
- Will it be a requirement to develop partnerships with WIBs or employers for Perkins funding?

Response: The commonwealth recognizes that outstanding issues remain in smooth alignment between WIOA and Perkins. In the interest of a Combined Plan, the commonwealth has determined to include Perkins in its Combined Plan at this time and will re-evaluate the fit between Perkins and WIOA as federal guidance becomes available. The commonwealth will amend the WIOA state plan if it becomes clear that the inclusion of the Perkins plan is detrimental to the achievement of the Governor's goals for the workforce system. At present, we believe that the inclusion of the Perkins plan is important because career and technical education is an integral part of the workforce development system. Therefore, we have decided to include Perkins as part of the WIOA state plan.

PDE appreciates the thoughtful questions. Perkins mandates must still be met. The programs of study must continue to be developed and offered. PDE will be revising the Perkins Local Plan to include additional requirements of the Perkins recipients based on the WIOA mandates. This means there will be additional documentation and assurance and reporting requirements in order to be compliant with WIOA. Federal Perkins regulation must be met which means each Perkins recipient must still meet Perkins and the development and offering of the programs of study. Where WIOA requirements for career pathways align with the Perkins programs of study, the expectation is that an alignment of the program of study to the career pathway occur. Perkins requires recipients to work with the WDB. This mandate still exists. Community colleges have excellent relationships with WDBs.

- **KEYS Program:** The Commission recommends that the Commonwealth reconsider the inclusion of the KEYS program in the State Plan and if KEYS is retained as part of the combined state plan, steps be taken to ensure that the KEYS program providers retain the flexibility that makes the program so effective. Pennsylvania's community college KEYS providers have strong relationships with their respective County Social Services approved training program's flexibility risks being taken away if KEYS is rolled into the WIOA. A more general workforce system does not take advantage of the close working relationships established by the community colleges. Any loss of funding or flexibility would only hinder the positive impact this program provides.

Response: The inclusion of KEYS in the WIOA Combined State plan will not alter the current fiscal or programmatic policies and procedures of the KEYS program.

- **Performance Measures:** The Commonwealth should ensure that education providers are assessed on multiple measures of performance and not rely solely on employment as a training provider performance measure. The Commonwealth should consider increased emphasis on completion of academic credentials as a performance measure. Difficulties associated with tracking students' employment upon degree completion, and barriers to successful employment e.g. failed drug screening, inability to pass credit checks, psychological or medical conditions labeling them as unemployable, must be considered in the development of performance measures. Without increased accuracy of data reporting and additional funds for wrap around services to address the barriers, measuring providers on a limited set of measures is cause for concern.

Response: We appreciate the comment and note that credential attainment is a required performance measure in addition to employment.

- Career Pathways: The State Plan envisions a system where career pathways are diverse with multiple entry and exit points. The Commonwealth could be served in this regard by utilizing community colleges as a key entry point, taking advantage of the benefits and relationships the community colleges have to offer. The community colleges are an ideal entry point on a career pathway, as they offer ABE/GED, KEYS, workforce development training, and certificates and associates degrees, often times with alignment to further postsecondary study.

Response: The commonwealth also views community colleges as a key entry point for career pathways. However, due to the numerous and varied needs of our constituents, they cannot be the only entry point. There are many rural areas of the commonwealth without adequate access to comprehensive community college services.

- Importance of on-the-job training (OJT): OJT and apprenticeship opportunities are an important component of the Commonwealth's workforce system and should be supported financially. Coordinating these efforts with resources such as WEDnet, industry partnerships, and microcredentials from Pennsylvania's community colleges will increase awareness and efficacy of these training/development programs.

Response: The commonwealth appreciates this comment and agrees that community colleges offer a significant opportunity for coordination with LWDBs, WEDnet and Industry Partnerships. The plan requires LWDBs to meet targets for expenditures devoted to training. OJT and apprenticeships are among the activities included as training for the purpose of this requirement.

- Support of veteran outreach: Pennsylvania's community colleges have long been recognized for their services to veterans, their dependents, and active military, and can serve as a valuable source of knowledge and expertise as models of best practices for providing services to this population. In 2015, the Community College of Allegheny County, Bucks County Community College, Butler County Community College, HACC – Central Pennsylvania's Community College, Northampton Community College, Community College of Philadelphia and Reading Area Community College were named to the Military Friendly Schools® list, which means that they exhibit leading practices to support military students. Five schools have official chapters of the Student Veterans of America: Community College of Allegheny County, Butler County Community College, Lehigh Carbon Community College, Montgomery County of Community College and Community College of Philadelphia. Several other schools have clubs for veterans that are unaffiliated with national groups. Four schools – Community College of Beaver County, Bucks County Community College, HACC – Central Pennsylvania's Community College, and Montgomery County Community College – were selected to participate in the US Department of Veterans Affairs' Yellow Ribbon Program for the 2014-15 academic year. The Commonwealth should consider utilizing the colleges' expertise in this area as part of the State Plan.

Response: The commonwealth appreciates this comment and the offer to serve as a model/best practice.

- Services to Rural Pennsylvania, Page 21, paragraph 2: Pennsylvania's community colleges provide programming that is available to every Pennsylvanian, including those in rural areas of the Commonwealth. The colleges collectively operate 118 instructional sites, with 27 sites located in rural counties and the colleges are continually adding programs to their online offerings. In the 2012-13 academic year, one out of every eight Pennsylvania community college credit students resided in a rural county. At two community colleges: Butler County Community College and Pennsylvania Highlands Community College, 95% of the credit student population resides in a rural county. Recent expansion into Jefferson, Clearfield, Elk, and Clarion counties continues to garner interest among students. The Commonwealth should utilize the experience of Pennsylvania's community colleges in provided quality academic and workforce programming to expand offerings to additional rural regions in the state.

Response: The commonwealth agrees that several of the community colleges have moved beyond their sponsoring service areas to provide education and training to unserved areas. The commonwealth has been a partner in many of these endeavors by providing capital funding to the sites and learning centers when possible. That does not negate the fact that there are still many rural counties that do not have comprehensive community college services available to its residents. The commonwealth will look to all of its partners in seeking the best way to serve the rural regions that are not currently served.

- Governor's Set-Aside Funding: Support of business-education partnerships is a critical component of a successful state workforce strategy. The Commission recommends that a portion of the Governor's discretionary funds under WIOA be allocated to community colleges to convene business-education partnership forums in local areas to expand and scale existing programs and share best practices. The colleges have existing relationships with employers within their respective communities and can use these relationships to form the basis of these forums.

Response: The commonwealth appreciates this comment and will take it into consideration when making final decisions regarding use of the Governor's set aside funds.

- Community College representation on Youth Committee: Community colleges have extensive experience serving youth aged 18-24, and as such would contribute significant value to the Youth Councils and relevant subcommittees. The Commission recommends that community colleges be required representatives on state and local Youth Councils and relevant subcommittees where the service areas overlap.

Response: We appreciate the comment and encourage state Board members, of which two currently represent community colleges, to participate on the committees of interest to them. Local workforce development board and subcommittee membership is determined by local elected officials and local boards.

- Community College representation on all WIOA boards: As a leading provider of education and workforce training in the Commonwealth, the Commission recommends that Pennsylvania's community colleges be appropriately represented on all boards and subcommittees, including a designated spot on the State Board for a community college president. Community college representation on these boards and subcommittees would help to ensure the expertise of the

colleges can be leveraged throughout the workforce system and can assist in policy development.

Response: The Workforce Innovation and Opportunity Act does not require the appointment of community college officials to be placed on the state board, although it does allow for it. The members of the PA Workforce Development Board (State Board) are appointed by the Governor. While not required, we note that there are currently two community college representatives on the state board, one of which is a community college president. WIOA Section 107 (b) (2) (C) (ii), pertaining to local board composition, states each local board "shall include a representative of institutions of higher education providing workforce investment activities (including community colleges)." The commonwealth must certify local board composition to ensure all required entities are appointed.

- Expansion of the PA-TIP program to include CIP 51: The PA-TIP program was designed to provide additional financial assistance to students to complete credentials in areas of critical workforce need. In many areas of the Commonwealth, health care occupations represent a growing employer need. The Commission recommends that CIP 51 be added to the list of eligible programs for PA-TIP to meet the current and future workforce growth in the health care field. Expanding the eligible PA-TIP programs to include the health care industries would provide much-needed financial assistance to students seeking to be employed in these critical occupations and assist students to secure employment in these industries.

Response: PA-TIP is a program created by the legislature in 2012 to prepare students with the skills in high demand by today's employers. The program, funded and administered by PHEAA, provides awards to students enrolled in specified programs of study. We will reach out to PHEAA regarding this request.

PA State Representative Tina Pickett offered multiple comments to include:

- While there is certainly value to upskilling the commonwealth's workforce, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training will negatively impact the delivery of valuable career and business services in my area. In rural counties without PA CareerLink(R) sites, WIOA funds support the staff and overhead for those counties. These are the same counties that have no forms of public transportation and these cuts would result in reductions in services or even the downsizing or closure of facilities. The training benchmarks ignore the many other valuable services the local workforce system provides to businesses and job seekers.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities, especially in rural areas. Local boards should retain

flexibility to address the needs in their communities while giving priority to those with barriers as the law requires.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self-service options both inside and outside of PA CareerLinks is of value in today's increasingly tech savvy society. However, the reality is that many customers, especially rural customers, do not have adequate internet service, strong technology skills or access to computers. There are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face-to-face career coaching and mentoring as well as the many other hands-on training and other programs delivered at PA CareerLink(R) centers and affiliate sites that lead to employment success and add value to our communities.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

PA State Representative Neal Goodman offered multiple comments to include:

- Training Expenditures: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title I funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks(R) in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well as job seekers that contribute to the regional economy.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- Priority of Service Benchmarks: Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- **PA CareerLink® - Online Services as an Enhancement:** PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self-service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face-to-face career coaching and mentoring as well as the many other hands-on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

PA State Representative Jerry Knowles offered multiple comments to include:

- **Training Expenditures:** While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title I funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well as job seekers that contribute to the regional economy.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- **Priority of Service Benchmarks:** Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self-service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face-to-face career coaching and mentoring as well as the many other hands-on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

PA State Representative Gerald Mullery offered multiple comments to include:

- Training Expenditures: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title I funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks(R) in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well as job seekers that contribute to the regional economy.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- Priority of Service Benchmarks: Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams

and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- PA CareerLink® - Online Services as an Enhancement: PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self-service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face-to-face career coaching and mentoring as well as the many other hands-on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

Homer C. Floyd of **PA NAACP** commented: Thank you for affording the Pennsylvania State Conference of NAACP Units an opportunity to comment on your proposed Workforce Innovation and Opportunity Act Combined State Plan. We are extremely supportive of its provisions to emphasize:

- career pathways as the primary model for skill, credential, and degree obtainment,
- expanding the pipeline of workers for targeted industry sectors through industry partnerships, WEDnetPA and other innovative strategies,
- providing opportunities for youth to participate in work based learning,
- engaging employers directly to close the skills gap and ensure employer talent needs are met,
- strengthening data sharing across agencies and with workforce partners to better understand education and employment outcomes and,
- soliciting input relative to any uncovered areas that would benefit from consideration.

By implication, the plan is both administratively and financially feasible. As proposed, it should have a positive impact on commonwealth of Pennsylvania residents. If we can in any way facilitate the development of support for this bold initiative, please do not hesitate to call on us.

Response: We appreciate the comments in support of the plan.

PA Workforce Development Association and **County Commissioners Association of PA** offered multiple comments together to include:

- On behalf of our two statewide associations, we submit the following comments on Pennsylvania's Workforce Innovation and Opportunity Act (WIOA) Combined State Plan for 2016-2019. The comments represent the consensus of our respective memberships, which together will be responsible for ensuring successful implementation of many of the provisions in this plan. PA Workforce Development Association represents the commonwealth's local

workforce development boards. County Commissioners Association of PA represents the commissioners of Pennsylvania's 67 counties. We are offering comments in three major areas of concern:

- Training Benchmarks and Priority of Service
- Performance Measures
- Recognizing the Roles of State and Local Areas/Regions in the Plan

The local system appreciates the opportunity to contribute to the commonwealth's workforce strategy for the next four years and offers our assistance toward successful implementation.

Response: We appreciate the comments and look forward to working with the local boards and county commissioners.

- The Commonwealth's local workforce development boards (LWDBs) and county commissioners support the Governor's goals and objectives as identified in the proposed state plan and agree that each local area and region should and will exert its utmost efforts to meet the Governor's agenda as described in the proposed state plan.

With this underlying understanding, PWDA and CCAP respectfully submit that to achieve the Governor's objectives as set forth in the plan, consideration of incorporating the flexibility allowed and encouraged by WIOA into the plan will allow local areas and regions to be responsive to the differing needs of their job seeker and employer customers. To that end, comments are offered with respect to the three underlying areas identified below.

Response: We appreciate the comment in support of the Governor's goals and objective and the willingness of each local area to exert its utmost efforts to meet the Governor's agenda.

- Training Benchmarks/Priority of Service: It is recommended that additional clarification as described below be considered with respect to Title I training expenditure goals:
 - Exclude dislocated workers from the training expenditure calculation as their eligibility is not based upon barriers. We believe this to be the intent, but it is not clear in the language of the plan.
 - Exclude youth from the training expenditure calculation as all youth must have a legislative barrier to be able to participate in a WIOA-funded program. We believe this to be the intent, but it is not clear in the language of the plan.
 - Exclude the 10% administrative portion of Title I contracts when calculating the minimum training expenditures, mimicking how the 75% out-of-school youth minimum expenditure requirements are calculated.
 - Include all allowable training activities under WIOA section 134 as well as work experience and internships in calculating training expenditures.
 - Include PELL, scholarships and other forms of financial aid to offset the Title I training target.
 - Include training conducted under other federal funding, including but not limited to American Apprenticeship, H1-B, National Emergency Grants and National Dislocated Worker grant programs, to offset the training target.
 - Include one-stop partner program training expenditures for participants dual enrolled in the one-stop partner program and WIOA (e.g. Trade Act). We believe this to be the intent, but a statement to that effect would make the section clearer.

- Include the cost of assessment and case management necessary for participants to enroll in and successfully complete training. 9. Include the cost of registration, books, lab fees and required uniforms.
- It is recommended that with respect to the goal of expending 50/60/70% of Title I training expenditures on individuals with barriers, additional clarification to this section be considered as described below:
 - Exclude dislocated workers from the calculation as their eligibility is not based upon barriers.
 - Include the local board definition of not earning a “self-sufficient” wage as one of the barriers.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets. We also note that administrative funds will not be included in calculating training expenditure benchmarks.

- It is recommended that the state plan also include a recognition that individuals with barriers may not always have the necessary qualifications, as required by WIOA §134, to succeed in training without further assistance from an adult literacy program or a stabilizing social service assistance. PA CareerLink® staff often refer these individuals for the assistance they need in order to be able to participate in training once their issues have been addressed.

Response: The commonwealth encourages the provision of such services concurrently with participation in training services rather than prior to such participation whenever possible.

- Similar to the recommendations with regard to the training expenditure thresholds, it is respectfully submitted that the state considers the following clarifications with respect to “priority of service”:
 - Exclude dislocated workers as their eligibility is not based upon barriers.
 - Include those individuals who fit in the local board definition of not earning a “self-sufficient” wage as one of the barriers, or that these individuals be considered low income, thereby entitling them to a priority of service.
 - Reconsider including the requirement to inform individuals, other than veterans and their spouses, seeking to access WIOA services of their priority of service. WIOA is not an entitlement program. By informing individuals of their priority, there is a concern that this will lead to complaints where an individual is not provided services due to other reasons.
 - It is recommended that the state consider incorporating a waiver process for local boards that can justify a rationale for setting a lower goal than described in the state plan for training expenditures and services / training for individuals with barriers.

Response: We appreciate the comment and agree that the 70% requirement should only apply to the WIOA Adult and Youth funding streams and will make that clear in the state plan. We will also edit the plan to note that only individuals otherwise eligible for WIOA services should be informed of priority of service status. The commonwealth will also reassess the priority of service threshold on an annual basis.

- **Performance Measures:** Pennsylvania's 23 local areas are anxious to deliver and exceed the performance baselines that will be negotiated by the state and which are contained in the draft plan. Because states and local areas are still transitioning to WIOA, and participants enrolled prior to publication of the measures will be included in the determination of the WIOA measures next year, it is respectfully suggested that consideration be given to lowering the targets for the performance measures to the baseline met by the state during its last year of performance under the Workforce Investment Act. This suggestion is premised upon the following:
 - The parameters for the calculation of the measures have not yet been issued by the U.S. Department of Labor and will not be issued until after the state plan is due.
 - There are 3 new adult/dislocated worker measures for which there is no existing baseline established under previous legislation upon which to estimate performance.
 - There are 4 new youth measures for which there is no existing baseline established under previous legislation upon which to estimate performance.
 - The method for calculation of all the WIOA measures will not be the same as under previous legislation.
 - Data needed by states and local areas to manage performance is a challenge to obtain because it is partially based on the Wage Record, which is 9 months in arrears. As a result, course corrections cannot be made until the year after performance for the previous year has already been determined. Under WIOA, the U.S. Department of Labor will be working on how to improve reporting; however, as we enter into WIOA we are still working under the current reporting system.
 - The penalty to states for not meeting the WIOA measures can be as much as a reduction of 5% to the State's 15% portion of the grants (WIOA § 116(f)). It is respectfully submitted that the state can set a lower baseline for performance in the plan while still encouraging and incentivizing local areas and regions to meet the Governor's thresholds. In doing so, local areas and the state can strive toward the Governor's goals without placing undue pressure and risk on the state and local system.

Response: WIOA presents many new performance measures and goals. For many, there is little or no baseline information. The targets as expressed in the plan represent a starting point for conversations among providers, partners, and policy-makers.

- **Recognizing the Roles of State and Local Areas/Regions in the Plan:** The local workforce development boards and commissioners recognize and applaud the Governor's goals for the citizens, residents and employers of our great state. It is the intent of the local workforce development boards to exert our best efforts to make the Governor's goals a reality for the Commonwealth of Pennsylvania. In enacting WIOA, Congress assigned roles to the states and to the local workforce development boards. The responsibility of the state board can best be summed up by the language of WIOA § 101 (d)(12), which includes as a function of the State Board the responsibility to develop policies to promote statewide objectives and enhance the performance of the state workforce development system. At the local level, pursuant to WIOA §107 (d), local elected officials together with the local boards are responsible for setting policies, approving how funds will be spent (the budget), and analyzing local conditions so they can make determinations on the type, mix and investments in services and training with their WIOA allocation. It is respectfully submitted that the state consider the benefit of allowing local boards the nimbleness embedded in the law to be responsive to local area needs, which vary across the

state, by incorporating as much flexibility as possible into the various sections of the state plan and into the policies that will be adopted to implement WIOA.

Response: We appreciate the comment and note that the State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved.

Aaron Schenk of **PAPSA** offered multiple comments to include:

- Hello. My name is Aaron Shenck and I am the Executive Director of PAPSA, which is a statewide association in Pennsylvania that represents about 150 private postsecondary career and technical colleges and schools. Upon receiving the draft State Plan for WIOA, I sent a copy of the plan to our schools and asked for their feedback. Below is a summary of the primary comments I received back; On pages 197-198, the WIOA plan discusses the Benefit and Service Approval process for TAA funding. Several schools we represent have told me this process does not provide the eligible participant the best choice of program that would benefit them. The current process for this program has in the past denied an eligible participant the ability to enter into the training program that served their needs and their future employer's needs the best, simply because the program was not the "lowest cost" program within a large geographical radius. The quality of the program and whether it fit into the needs and choice of the participant and employers was traded away simply because it wasn't the perceived "lowest cost" program. There are even cases we know of where eligible participants decided not to attend job training because they could not attend the program they wanted and did not want to travel many miles away to another program that was not what they needed simply because that program was "lowest cost."

Furthermore, the cost of the program is determined by the final sticker price of the program. However, most of these "lowest cost" programs are at public institutions that receive very significant public subsidies in order to provide that sticker price. The only reason why the sticker price of the program is "lowest" is because the government is already funding a sizeable share of the program. There are many private programs that are in reality a lower cost than many of the public options, if you factor out the other public dollars going into the public option to subsidize the sticker price of those schools. Thus, the "lowest cost" rule is forcing some eligible participants into a program that is not their first choice because the state thinks it is lowest cost, but then the state and local community have to add to that cost after TAA funds are provided. It is highly recommended this policy be changed and let the eligible participant choose the program that best meets their training needs. If the state does not make this change and wants to still focus on the final sticker price cost - regardless of what the eligible participant feels they need and regardless of the fact the state and community will have to subsidize additional dollars to this program - then why not offer an option for the eligible participant to be awarded the amount of the lowest cost program and then allow them to use those funds to the program of their choice. By allowing this kind of cap in the cost and then allow the student to take those dollars to the program of their choice would better serve the interest of the eligible participant and the employment needs of the state, while still managing the costs of the TAA program.

Response: Training Available at Reasonable Cost. The regulations at 20 CFR 617.22(a)(6) require that training be, among other things, at a reasonable cost. Further, approval requires that the training be at the lowest reasonable cost (20 CFR 617.22(b)). In particular, training at a facility outside the worker's normal commuting area, as determined under the state law (20 CFR

617.3(k)) that involves transportation (or subsistence) costs which add substantially to the total costs of training must not be approved if other appropriate training is available at a lower cost within the commuting area. When training substantially similar in quality, content and results, is offered at more than one training provider, only the lowest cost training may be approved (20 CFR 617.22(a)(6)(iii) (b)). A state must disapprove a training program if the training is in an occupational area which requires an extraordinarily high skill level and for which the total costs of the training are substantially higher than the costs of other training which is suitable for the worker (20 CFR 617.22(b)). Therefore, computation of a transportation payment is an important part of the determination of whether a particular training program is available at a reasonable cost. The 50 mile radius is a Labor & Industry decision based on an appropriate daily commuting distance. In the case where a participant decided not to attend any job training program, we take into consideration many variables and must adhere to the Trade Act of 1974, as amended, with our decisions. A participant has the right to appeal any decision that is made by Trade Act Services. USDOL provides L&I with federal funds in the form of a grant, and L&I executes Trade Master Agreements to disburse such grant monies with institutions for the provision of TAA training and services. Funds are not paid directly to participants.

- On pages 171-172, the Perkins State Plan for the CTE Perkins Grant program, there is concern for the Evaluation and Performance Measurement Indicators used. In prior Perkins plans, some of the measures have been inaccurate in evaluating performance. Some of these indicators should be improved. For example, the indicators referring to nontraditional post-secondary student participation and completion uses numerical targets that are averaged across all CIP codes resulting in unrealistic performance targets.

Response: Federal Perkins performance measures are mandated measures that have been developed and negotiated and agreed upon with USDE. These measures will not change unless Perkins V mandates different measures.

- The final recommendation is anecdotal, but I have had several schools issue concern on the High Priority Occupation lists. They have indicated there are career fields that they know are in high-demand, but have not always made it onto the state or local High Priority Occupation lists. There is not a specific recommendation on how to improve this, but there is a general sense from some of the schools that the creation of these lists needs to be improved to better capture all the current high-demand career fields.

Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length for the petition approval. We also note that local areas can petition for the inclusion of occupations based on documented employer demand.

Ajeenah Nuriddin-Little of **Peirce College** commented: How will the workforce system impact Perkins programming; specifically funding and the transition from secondary to post-secondary education?

Response: Federal Perkins funds must support the mandated uses of funds. Though a combined plan is proposed, the federal Perkins recipients must still develop and offer Programs of Study. Therefore, students in the secondary CTE POS are still eligible for postsecondary college credit as they pursue the postsecondary POS.

Craig Townsend of **Penn Sheet Metal** commented: I didn't have time to read every word. One segment that I believe should be included and possibly I missed it is Entrepreneurship. Training workers is great, they can take our investment in them to other states and they will. However educate people with the skills required to own, finance, plan, market, and operate their own businesses and now you have a winner. You have someone creating jobs, someone the state can continue to over tax, a for profit company, someone who will provide the OJT, and someone who will remain and contribute the prosperity of the state. Training people to fit into a box is all good and the state needs that, this will be a challenge for education however I believe this program should also include practical education in the areas I mentioned to allow someone the create opportunities.

Response: Pennsylvania has a number of Small Business Development Centers (SBDCs) across the commonwealth that are partners within the Partnerships for Regional Economic Performance. SBDCs regularly provide training and technical assistance to those interested in entrepreneurship. The plan requires LWDBs to meet targets for expenditures devoted to training. Entrepreneurship training is among the activities included as training for the purpose of this requirement.

JoAnn Weinberger of the **Pennsylvania Association for Adult Continuing Education** offered multiple comments to include:

- I am JoAnn Weinberger, Co-Chair of the Public Policy Committee of the PA Association for Adult Continuing Education (PAACE). PAACE is the association representing working professionals in the field of adult education in Pennsylvania, with over 400 members representing every region and services in every county.

First, I would like to commend the Department of Labor and Industry for the open process used in the development of this draft state plan. The Committee structure and invitation for adult educators to join the discussions provided for the involvement of the field and their input is infused in this plan. The strong presence and value placed on adult basic education is encouraging, and the 70% requirement to serve those with priority of service: recipients of public assistance, other low income individuals and individuals who are basic skills deficient is notable. Recognition of Adult Basic Education as a "critical partner" (p. 37) provides acknowledgement and appreciation of the services included. And, the quality of the programs is demonstrated (p. 58) by Title II exceeding all negotiated performance targets annually since 2011-12. The collaborative effort that produced this plan needs to continue, and we recommend that a statement to that effect is placed in the plan. There are policies, guidance and/or program elements yet to be developed that can benefit from the continued invitation for adult educators to join the discussions. Although these areas do not need to be specified in this plan, strategically they must be developed within the initial implementation of WIOA State Plan. Specifically, the areas for inviting adult basic education providers to provide input include:

Response: We appreciate the comments in support of the plan. It is important to note that while Labor & Industry led the facilitation of the State Plan submission, Title II was involved in every aspect of the plan development. As we implement the plan, Title II will remain a full partner in our efforts.

- Provide integration and alignment of educational services including co-enrollment (p. 14, 29). This is key to the spirit of WIOA. On page 8, there is acknowledgement that "A key factor in accomplishing our five broad goals will be to boost interagency cooperation on workforce issues

to achieve a team effort...and to amend it.” Although you have established a policy interagency workgroup of representatives from each department in addition to the State WDB, the reinstatement of the Adult Basic and Literacy Education Interagency Coordinating Council (ICC) as legislatively required by Act 42 of 1996, the Pennsylvania Adult Basic and Literacy Education Act, would provide an important vehicle for the development of the policies and guidelines yet to be developed, as its mandate is to coordinate existing adult basic and literacy education services provided by the departments of Education, Welfare (now Human Services), Labor and Industry, and Community and Economic Development. With representation from each department along with business/industry/unions, adult education providers, state legislators and others, this Council can provide a venue for brainstorming and discussion around key issues, including data integration and coordinating varied program services across departments. Although Aging is not a mandated partner, they came to the table with their educational efforts. Although this Council is now defunct, it could once again be used in support of the goals of the PA WIOA Combined State Plan, including “seeking discretionary grant funds...to serve those most in need.” (p. 33) The addition of recognition of the role of the ICC in boosting interagency cooperation would enhance this Draft State Combined Plan.

Response: We appreciate the suggestion that reinstatement of the Adult Basic and Literacy Education Interagency Coordinating Council could provide an important vehicle for ongoing development of policies and guidelines. In addition, the commonwealth strongly supports interagency collaboration. The commonwealth will review this suggestion regarding the ICC and determine how a reinvigorated council can best fulfill these goals.

- Provide integrated education and training (p.12, 2.11 and p.50) which will require thoughtful consideration of partnerships and the networking needed for their development as well as requirements for implementation.

Response: We appreciate the offer to provide input in support of policy and guidance for integrated education and training.

- Develop career pathways that combine guidance, education, training and support services...with coaches that will help guide individuals...(p. 35). Career pathways with on ramps for the low skilled, with acknowledgement that developing literacy skills is not a short term process, need to be included. Title II programs include career coaches/case managers, limited by the funding available to provide those services. Local providers can recommend how to coordinate with CareerLinks and other case management provided through other programs so limited resources will be optimized. Adult basic education includes workforce preparation as does other programs, and again local providers can recommend how this will be coordinated.

Response: We appreciate the offer to provide input in support of policy and guidance for coordination of services.

- Support the efforts of “...the commonwealth conven[ing] panels of local representatives to assist LWDBs in interpreting and implementing this definition.” (p.89 referring to the definition of basic skills deficient.) These local representatives should include Title II providers as they have the most experience with approved assessments and services.

Response: We appreciate the suggestion to include Title II providers on the panels and agree it would be beneficial.

- Expand access to online education and training programs that result in industry-recognized credentials (p. 11). In addition, the area of expanding access to online education programs should be included as a tool for distance learning and blended learning for those without a high school diploma or equivalency.

Response: The commonwealth intends to explore options for distance learning for the provision of some adult basic education services.

- Identify models and effective practices for out-of-school youth (p. 13, 3.1). The new requirement to use 75% of Title I Youth funds for out of school youth age is an area in which adult and family literacy professionals throughout PA can provide guidance. In 2014-15, OSY served by Title II were over 6,000 (to be exact, 6347). Recruitment, assessment, and services were provided and outcomes achieved. These OSY aged 16-24 represented every literacy level and were involved in career pathways. As the Department of L&I develops policies and guidance for the field, as you develop the “tools for low literacy,” I encourage you to include adult education providers in your work. They can provide you with models for that are evidence-based. Furthermore, the Philadelphia Youth Network, the intermediary for the Title I Youth funds in Philadelphia, has direct and important experience in serving this age group. Their services to OSY without a high school credential include recruitment, assessment and programming that includes transitioning them to postsecondary or careers and can serve as a model for other Workforce Development Boards.

Response: We appreciate the offer to assist in the development of policies and guidance in serving OSY.

- Develop low-literacy tools and models for out of school youth who are basic skills deficient and far from proficiency in reading and math (p. 14-3.6). Research on adult literacy has already identified tools and models that can be adopted or adapted. Identification of tools needed should be included as well as the resources to implement the models and tools already available.

Response: We agree with the comment and will alter the plan to indicate that the commonwealth will "leverage" tools and models.

- Establish additional performance measures (p. 17, Goal 5). As these relate to adult basic education, the providers can provide key input. The number of outcomes per enrolled student (p. 57) has already been added.

Response: If the Division of Adult Education decides to develop additional performance measures for adult education providers funded through the division, it will seek input from providers.

- Establish additional services needed for immigrants (p 20, growing immigrant population) and those with less than a high school diploma (p. 23) in order to meet the Governor’s goals.

Response: We appreciate the comment and welcome suggestions of additional services for immigrants and those with less than a high school diploma that will assist in meeting the Governor's goals.

- Clarify that areas for improvement (p. 29) should include, for bullets 3 and 4 Integration and alignment of education services and workforce programs, SNAP E&T with Title II beyond the ABAWD for improved use of resources. Further actions to coordinate services through SNAP E&T (p. 43, bullet 2) refers to WIOA core programs, but could be enhanced to specifically mention Title II. The providers of Title II services are encouraged by the inclusion of this federal program and stand ready to assist in the development of the policies and guidelines for this coordination. Unfortunately, the description on page 189 which includes the educational components is not helpful in trying to determine how the current funds flow and the paperwork requirements. Furthermore, the community-based organizations could leverage their private funds for the 50-50 match that would add to the funding now available.

Response: We appreciate your interest in finding the best ways to serve our clients. Some of the language was written more broadly to allow for flexibility in future programming. DHS is currently working on improving the methods for providing E&T services to SNAP clients and intends to engage in ongoing conversations with our community partners. DHS is also exploring potential ways to implement a 50-50 program in Pennsylvania.

- Terminology throughout this plan is not always consistent. For example, on pages 8, 9, and 50 the term adult basic education is used, with the definition related to career pathways on page 8. Other terms used are low skilled adults on page 8, basic skills deficient on page 14, far from proficiency in reading and mathematics on page 14 and those who do not speak English on page 21. I know that some of this inconsistency is in the law and regulations. However, for this plan, it would be helpful to either have a set of definitions or provide for consistency.

Response: We appreciate the comment and echo the commenter's point that the perceived inconsistencies are driven by federal law and regulations.

- Operational Planning Elements (p. 33) recognizes state agency needs for professional development, but specific roles and opportunities for cross-agency collaboration need to be part of the professional development system for the providers in each agency represented by a core program AND combined programs. This professional development should be added to "Coordination, Alignment and Provision of Services to Individuals" (p. 46, paragraph 3).

Response: We appreciate the comment and will add "provider staff" to sentence referenced on page 33.

- In partnership with the State WDB, the commonwealth will conduct a comprehensive assessment of programs in other states that promote the formal integration of workforce programs (p. 33). PA adult education providers have colleagues in these states, and thus both in PA and those states providers should be included in the comprehensive assessment. For example, I am a national trainer for the Leadership Excellence Academy on Program Improvement in Texas and have direct contact with Program Directors.

Response: The commonwealth will work with all plan partners to determine best practices in formal integration of workforce programs.

- The description of Adult Basic Education (p. 37-38), case management (p. 46) and Title II (p. 101-107) are excellent as operational statements. This may have been the directions given; however, they would be enhanced by additional strategic/tactical statements. One example would be the inclusion of an explicit statement that it is a tremendous challenge to determine how best to invest meager resources given the magnitude of the state's literacy problem. It is stated early in the plan that a priority will be given to the "hardest to serve." If that is true, the system in general should be looking at employment on-ramps for low-literate adults using a stackable credentials model. This addition could be made at varied places in the Plan. Furthermore, the statement re case management in adult education (p. 45) is valid within the confines of limited resources, but an integrated case management system will require additional funds.

Response: We appreciate the comment but feel the plan sufficiently addresses the issues noted as drafted.

- Additional efforts described on p. 47-48, the next to the last bullet, should add the word "contextualized" to the basic skills instruction to support incumbent worker training.

Response: We have accepted the suggestion and added the word "contextualized" to the item.

- Adult basic education programs have a strong professional development system, distance learning program, and experiences that should be recognized in the alignment of programs. At the same time, there needs to be acknowledgement of the resources needed to form the required networking, collaborations, memorandum of understandings and contracts.

Response: The commonwealth recognizes that resources will be needed to meet the collaboration and alignment goals of the plan and will explore options to support all of the core programs and PA CareerLink® partners to implement these activities.

- The use of the needs-based formula for Title II (p.64, p.102) will require further work and should be acknowledged in this Draft State Plan. This formula, developed in 2010 by a group of administrators, including me, took into consideration variables, including education levels and poverty in each county, with data from the American Community Survey and funding at that time. Now, six years later, additional data runs need to be examined to determine if the formula will need to be tweaked and/or phased in and not adopted as is for the 2017-18 program year.

Response: We thank you for your comment. However, PDE has reviewed the formula and feels that it is still appropriate. We will use updated data to populate the formula. The formula is used to determine the funding that will be available in each local workforce area and will be used for the competition. Therefore, it cannot be phased in.

- Goal 2.1 (page 10) should be clarified as to whether the benchmarks refer to all three high priority areas, which includes low basic skills with the language "50% must be spent on low income individuals and individuals with other barriers to employment." Is there a reason why low income is singled out when the law specifies all three high priority areas?

Response: All three priority populations are included in the benchmarks as are individuals with other barriers to employment, such as ex-offenders, individuals with disabilities, and older individuals, amongst others.

- Effective work with employers defined for Title II (p. 32). How will this be measured?

Response: The performance measure "effectiveness in serving employers" has not yet been defined by the federal government. We expect the measure to be defined in final regulations, which are expected to be published later this year.

- Ability to Benefit (p. 43, bullet 4) should include acknowledgement of the change in definition provided in the Omnibus Appropriations Bill that states that the 6th grade reading level is the base requirement. In the long term, education success beyond reading at the 6th grade level will be required and the career pathways need to demonstrate, beyond the entry point, where further education services are needed.

Response: We appreciate the comment.

- Input for Goal 5 (p. 17) can also be provided by PAACE directly. The Association annually provides return on investment data.

Response: We appreciate the offer to provide return on investment data.

- Priority of service is addressed directly and the requirement to spend 70% of the Title I funds on those in need of priority service, including those who are basic skills deficient addresses the critical need. The examples given on pages 68 and 69 are helpful; however, what is not addressed is what happens when there are 10 slots and 20 applicants who all have priority of service. Then, which of the three priorities takes precedent? How are decisions made? An example addressing this issue should be added.

Response: Goal 2.9 addresses the order by which those in priority of service categories receive priority. In the event all were at the same level of priority, slots would generally be filled on a first-come, first-served basis.

- The requirement for LWDBs and PA CareerLink centers (p. 69) to address methods they will use to apply the WIOA priority of service requirements is a welcome addition. Historically, potential participants who were basic skills deficient did not receive a priority of service. Title II partners can provide support for the recruitment phase (iii) and thus, "partners" should be added to the example.

Response: We appreciate the comment in support of this addition. We will encourage LWDBs to utilize Title II partners in developing their priority of service strategies.

Douglas Gibboney of the **Pennsylvania Association of Goodwills** offered multiple comments to include:

- Since its founding in 1902, Goodwill Industries has believed in the "Power of Work" to strengthen individuals, families, and communities. The Pennsylvania Association of Goodwills (PAG) is made of eight independent affiliates who have 4200 employees including over 500 workforce development professionals who provide services to Pennsylvanians in need. Supported by private, public, and self-funded retail revenue sources, PAG affiliates served approximately 41,000 Pennsylvania residents in 2015.

Several PAG affiliates have collaborated with private and public partners to address local workforce development needs. Through these experiences, PAG presents the following reflections and suggestions regarding the proposed Workforce Innovation and Opportunity Act (WIOA) Combined State Plan.

The required shift of Title I funding to training will erode high-quality employment services delivered to people with barriers to employment. (WIOA Plan 2.1, p.10) Providing additional career training opportunities should be supported; however, the reduction in funding for direct employment services at the CareerLink® will adversely impact the quality and quantity of services provided to Pennsylvanians with barriers. Simply put, it is the "human" in "human services" that makes the most impact. Many of the "barrier" populations cited in the plan require considerable face-to-face time to navigate complex public systems.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- The movement of CareerLink® services to an on-line format will result in service reductions to rural and barrier populations. (WIOA Plan Section I, p. 29) Central to transition of 50% of Title I funding to training is the belief that more core/intensive services can be provided through an online format. While PAG embraces technology as a method to address some workforce development needs, our experience has been that many people with barriers do not have basic technology skills. In addition to these issues, access to the required technology is not a given in every household. For example, many rural areas of Pennsylvania lack the broadband infrastructure that metropolitan areas take for granted. It is through the synergy of competent workforce professionals along with convenient physical access to technology that best addresses these capacity challenges.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

- An adult high school diploma option with an integrated career-based curriculum would best address the needs of the targeted barrier populations. Almost one million Pennsylvanians over the age of 24 lack a high school diploma despite having access to GED programs. While the GED option serves a segment of the 'dropout' population, in isolation it does not provide ample opportunity to develop and practice important workplace skills. Dr. James Heckman, the Henry Schultz Distinguished Service Professor in Economics and one of the world's leading figures in

the study of human capital policy, has found that programs that encourage non-cognitive skills effectively promote long-term success for participants...His work has shown that GED recipients earn less than other high school dropouts with similar ability levels (University of Chicago Chronicle, January 2004)." PAG agrees that an integrated approach works best (WIOA Plan, Local Activities, p. 101). Several viable models exist including the Goodwill Excel Center model from Indianapolis and the Goodwill Helms Academy model operating in Philadelphia. At the core of each model is a focus on career development, managing through current and future barriers, and achieving a high school diploma as an interim step toward employment and post-secondary education. Unique approaches include on-site childcare, life skills coaching, and most importantly, ample opportunity to interact with staff who constantly reinforce workplace expectations, and concurrent credentialing in high-demand certificate credentials. Third-party research has substantiated these results as evidenced by the attached 2014 Ball State University study.

Response: The commonwealth appreciates the suggestions.

- As PAG-affiliate members, we greatly appreciate the opportunity to present our suggestions and experiences from serving our fellow Pennsylvania resident for nearly a century. We intend on working collaboratively with other private and public partners to address the emergent workforce development needs of Pennsylvania. We, like our founder Dr. Edgar Helms, remain dissatisfied until every person with a disability or disadvantage has an opportunity to develop to his/her fullest usefulness and enjoy a maximum of abundant living.

Response: We appreciate the commitment and efforts of Goodwill Industries to provide opportunities and service to Pennsylvanians.

Scott Heller of the **Pennsylvania Association of Psychiatric Rehabilitation Services** offered multiple comments to include:

- PAPRS would like to thank Governor Wolf and his staff for the opportunity to comment on the PA WIOA draft plan.

We applaud the extensive thought and obvious commitment that went into the development of this document; it provides a comprehensive plan by which Pennsylvania can support individuals with disabilities to pursue their goals for employment and vocational success.

PAPRS as an association of individuals and organizations from across PA dedicated to supporting individuals with psychiatric disabilities to have success and satisfaction in the areas of living, learning, working, and socializing; we have long been involved in supporting persons to regain recovery and community participation thru work. It is based on our experience in supporting such individuals to gain, or regain meaningful employment, that we would like to offer the following comments on the draft WIOA.

According to recent information, almost 80% of the 7 million individuals served in the public mental health system in this country are unemployed despite the vast majority of these individuals expressing the desire to work (NAMI Blog 7/14/14). In consideration of these

numbers, we hope that the WIOA will seek to identify specific opportunities to serve and support this population seeking employment.

Along these lines, we have some suggestions for the draft document:

Response: We appreciate the comments.

- Page 13- “The commonwealth will further support local efforts by ensuring that state agencies overseeing local and regional programs that focus on high-risk young people, including those who are in foster care and/or juvenile justice systems, are homeless, or are pregnant or parenting, will work together to build coordinated approaches that support local areas’ efforts to enroll and retain these young people...”

Comment: consider including youth and young adults involved in the public mental health system.

Response: We appreciate the comment and will add the suggested population to that statement.

- Page 30- “Another key aspect of cross-program alignment is well-trained staff. The commonwealth will support improved and more frequent customer service and cross-program staff training to increase staff knowledge and allow for better service delivery.”

Comment: identify and support cross-program alignment including training with mental health sources that promote pre-vocational and vocational services.

Response: We appreciate the comment.

- Page 115- State use contracting programs. “As noted above, OVR has a MOU with ODP and is in the discussion stage of updating it. The possibility of an Interagency Agreement with the Department of Human Services (DHS) is being investigated.”

Comment: complete a similar MOU with OMHSAS

Response: We appreciate the comment. We will consider developing a similar MOU with OMHSAS.

- Page 121- “OVR and ODP are currently working on a coordination policy to enhance the employment outcomes for individuals with intellectual disabilities....The intended result is for a more seamless entry into employment for individuals with intellectual disabilities and for the coordination of extended services to allow individuals to maintain long-term employment. This is important because many of the supported employment services assist individuals with intellectual disabilities to gain, stabilize and maintain successful employment.”

Comment: consider work on a similar coordination policy with OMHSAS

Response: We appreciate the comment. We will consider developing a similar MOU with OMHSAS.

- Page 128- Staff Development. “As in past years, as part of developing a training plan, OVR will complete an annual internal survey to determine the training needs of professional and paraprofessional staff. In order to ensure that OVR’s personnel receive significant knowledge from research and other state-of-the-art methodologies, OVR seeks out and provides presentations by university faculty experts in the field of rehabilitation, and statewide and nationally known speakers at in-service training programs. In addition, OVR coordinates efforts with various professional associations such as the Pennsylvania Workforce Development Association, Pennsylvania Association of Rehabilitation Facilities, National Association of Multicultural Rehabilitation Concerns, Pennsylvania Rehabilitation Association and the Association for Education and Rehabilitation of the Blind and Visually Impaired to train and retain qualified personnel.”

Comment: consider technical assistance and training resources from expert sources in the field of rehabilitation and employment for individuals with significant mental health challenges. This includes both university based training as well as training and technical assistance from organizations representing those doing this work in the field of psychiatric rehabilitation, such as the Pennsylvania Association of Psychiatric Rehabilitation Services.

Response: We appreciate the comment in support of this effort. OVR is committed to professional development and utilizes subject matter experts and available training opportunities from a variety of resources and providers.

- Page 136- “Goal #1: Increase Employment Opportunities for Individuals with Disabilities
 - Expand the availability of apprenticeships, internships and on the job training (OJT) for individuals with disabilities.
 - Partner with the Bureau of Workforce Partnership and Operations (BWPO) to ensure programmatic and physical accessibility of the PA CareerLink® centers for equal access for individuals with disabilities.
 - Create and expand interagency agreements between OVR and local Career and Technology Centers and other community-based organizations.”

Comment: consider including those community-based organization using Evidenced Based Supported Employment practices applicable to the population served.

Response: We appreciate the comment in support of this effort. OVR partners with community-based organizations and agencies that provide services for individuals with disabilities and will consider organizations using Evidenced Based Supported Employment practices.

- Page 136- “Goal #2: Increase/Improve Transition Services for Students with Disabilities
 - Increase pre-employment transition services for students with disabilities.
 - Increase opportunities for students to gain workplace skills and community-integrated work experiences.
 - Enhance collaborative relationships with DHS, PDE and higher education.
 - Expand BBVS Overbrook School for the Blind Summer Transition Initiative to create summer employment opportunities for transition age students who are blind.
 - Research best practices for the implementation of peer mentoring opportunities.”

Comment: consider including in this section best practices in Supported Education.

Response: We appreciate the comment and will include best practices in Supported Employment when implementing transition services for students with disabilities.

- Page 158- Quality Standards: “OVR provides technical assistance and training for its staff through the use of seminars, conferences, and training programs. SE services provided by community based service CRPs are reviewed at least every 5 years to look at relevance and costs related to such services. Staff from Virginia Commonwealth University (VCU), OVR and the Pennsylvania Association of Rehabilitation Facilities (PARF) developed statewide standards for OVR and CRPs of SE services. These standards continue to guide all contracts and contract reviews for provision of SE services.”

Comment: consider adding Pennsylvania Association of Psychiatric Rehabilitation Services, Mental Health Association of PA, Mental Health Association of Southeastern PA, PA Peer Support Coalition, and other groups that represent specialized knowledge and resources for supporting individuals with mental health issues to fulfill vocational aspirations through application of effective educational and vocational supports.

Response: We appreciate the comment. As OVR seeks comment on its proposed revision to its Supported Employment Policy in the spring of 2016, the agency will consider input on the various qualifications, credentials, certifications and specializations in Supported and Customized Employment available to effectively serve eligible individuals with the most significant disabilities.

Susan M. Lichtenfels of the **Pennsylvania Council of the Blind** offered multiple comments to include:

- The Pennsylvania Council of the Blind is a grassroots advocacy organization made up of over 400 members across the Commonwealth who experience blindness or vision impairment. PCB gives a collective voice to these individuals on issues that impact their lives and the lives of all Pennsylvanian’s with a vision loss. In this capacity, PCB would like to provide comment on Pennsylvania’s Workforce Development Plan (FY 2016-FY 2019) as proposed.

Accessible Software: On page 70, in the section entitled “Non-Discrimination and Accessibility,” the narrative describes the various accessibility features of the one-stop operators and one-stop partners. While we applaud these centers for providing screen reader software such as JAWS and magnification software such as Zoomtext, there are two concerns we wish to raise.

- While JAWS and Zoomtext are two of the more popular screen reader and screen magnification programs, not all patrons who are visually impaired know how to use these specific brands. Our recommendation in this regard is to add a second alternative for screen reading and magnification. One free alternative which is gaining more popularity is Non-Visual Desktop Access (NVDA). NVDA is an open-source screen reading software which can include a free add-on for screen magnification.
- The narrative does not indicate with what regularity this software is being updated to insure maximum accessibility. Offering software that is woefully outdated limits the functionality of the user experience. If not already part of the ADA compliance recertification guidelines for the one-stop centers, PCB recommends that all accessibility software be up-to-date to pass recertification.

Response: We appreciate the comment and proposed recommendations. To ensure meaningful access to all customers one-stop centers must be physically and programmatically accessible to all customers, including individuals with disabilities. WIOA Section 188 Nondiscrimination and Equal Opportunity NPRM, 29 CFR Part 38 proposes to revise federal regulations to ensure access to the workforce system by people with disabilities by bringing the regulations in line with updated disabilities civil rights law and ADA compliance recertification guidelines for the one-stop centers. OVR supports PCB's recommendation that all accessibility software be up-to-date to pass recertification. Regarding the various accessibility features of the one-stop operators and one-stop partners, the Pennsylvania Council of the Blind (PCB) contends that while JAWS and Zoomtext are two of the more popular screen reader and screen magnification programs, not all patrons who are visually impaired know how to use these specific brands. OVR supports PCB's recommendation for PA CareerLink® to consider adding a second alternative for screen reading and magnification, such as Non-Visual Desktop Access (NVDA), a free alternative which is gaining more popularity and an open-source screen reading software which can include a free add-on for screen magnification. We will make local boards and PA CareerLink® centers aware of this resource.

- **Citizen Advisory Committees:** On the section on Citizen Advisory Committees (CACs), as described on page 110, PCB appreciates the response of OVR to the recommendations. PCB strongly supports the actions indicated in these responses because in some districts the CACs are not meeting or if meeting receive very limited support from OVR.

Response: We appreciate the comment in support of this effort.

- **Personnel Development:** With regard to “Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development,” which begins on page 122, there are a number of concerns relevant to people with vision loss that we wish to address.
 - Blind and visually impaired individuals rely on the instruction from Orientation and Mobility (O & M) professionals to travel to school, work, medical appointments, and daily living sites such as the grocery store, the bank, the pharmacy, the post office, etc. This training is absolutely vital to the safety and independence of people with vision loss. Based on the numbers provided, there are currently eleven positions held by O & M professionals and seven current vacancies. Of the eleven current employees, six are projected to retire within five years. These numbers are of grave concern. From the percentage perspective, currently 37 percent of the available O & M positions are vacant with 33 percent of the current staff due to retire within the next five years. We commend OVR for recognizing the importance of these professionals by waiving the state residency requirement and developing a paid internship program. But clearly, based on the numbers, OVR needs to develop even more strategies to recruit and hire these professionals and make this area of personnel development a higher priority.
 - Within the Bureau of Blindness and Visual Services, staff hired in the positions of orientation and Mobility Specialists and Vision Rehabilitation Therapists are required to have achieved both a Bachelor's degree and a practicum in their field. These professionals have met certain standards of knowledge, experience, and conduct in their given fields. Unfortunately though, what has become obvious to BBVS clients is that such standards are not a requirement to be hired as an independent contractor to teach/train clients on assistive technology. In many ways, the assistive technology skills taught to individuals who are vision impaired are as vital to daily living independence

and employment success as the skills taught by these other two professionals. The Academy of Certification for Vision Rehabilitation and Education Professionals (ACVREP) is currently developing a certification program to insure that individuals teaching assistive technology meet basic standards. It is our recommendation that OVR review the ACVREP Certified Assistive Technology instructional Specialist (CATIS) proposed standards and establish its own basic standards for BBVS' AT instructors. Once OVR adopts such standards, all existing BBVS AT contractors should be re-evaluated to confirm they possess the minimum instructional, experiential, and knowledge requirements. All new AT consultants should be required to either meet these same standards or possess CATIS certification.

- Through PCB member participation on the Citizen Advisory Committees, it has been observed that within OVR the hiring process takes, on average, three to four months to fill vacant positions. Vocational rehabilitation services for people with disabilities are in high demand as shown by the needs for priority of service classifications and the service waiting lists for clients already enrolled. In some cases, district offices are barely treading water to meet client needs. Surely there is a way to decrease these long delays in filling vacancies; especially for the direct service provider positions.

Response: We appreciate the comment in support of this effort and recognize OVR's need to improve. The State Civil Service Commission sets the minimum education and training (METs) requirements for O&M Specialist and Vision Rehabilitation Therapist positions. OVR acknowledges the civil service hiring process is slow and OVR works closely with L&I Human Resources to fill vacancies in a timely manner.

Grant R. Gulibon of the **Pennsylvania Farm Bureau** offered multiple comments to include:

- Pennsylvania Farm Bureau (PFB) is pleased to offer the following general comments on the Commonwealth's Workforce Innovation and Opportunity Act (WIOA) Combined State Plan ("the Plan"). PFB is the Commonwealth's largest general farm organization, numbering more than 61,000 members. PFB and its 54 county organizations have provided legislative support, information, and services to Pennsylvania's farmers and rural families since 1950.

A stable, skilled and legal workforce is critical to the future growth and development of Pennsylvania's agricultural economy. Given that agricultural employers have the most detailed knowledge of both the number of workers they will need, both now and in the coming years, and the types of the skills they expect those workers to possess, the Plan should make certain that such employers are duly represented on local workforce development boards (WDBs) and other relevant decision-making bodies.

Pennsylvania agricultural employers already provide valuable input to the state Department of Agriculture (PDA) through their participation on various advisory committees, working groups, and other entities that develop farming-related policies, and their participation in workforce development activities can be just as helpful to the Commonwealth in achieving its economic development goals.

Response: The PA Department of Agriculture (PDA) agrees with the Pennsylvania Farm Bureau (PFB) and appreciates its support of the items related to connecting agriculture and food suppliers to workforce development and agriculture education initiatives. PDA considers PFB an

important partner in our outreach to the business community and counts on the involvement of PFB in our workforce development initiatives going forward. We also agree that it would be favorable for agricultural employers to be duly represented on LWDBs and on other relevant decision-making bodies, and they are encouraged to serve.

- With regard to PDA, the Plan highlights its unique role in workforce development, including its recent addition of a special assistant focused on this area and the Secretary's participation with other cabinet members on the state WDB. Pages 41 through 43 of the Plan provide additional information about how PDA is working with other state agencies and private sector groups to provide rehabilitation, education, and training services to current and prospective farm workers, and continued support for its activities in this area should be encouraged.

Response: We appreciate the encouragement from PFB in PDA's planned efforts to collaborate with other state agencies and private sector groups that serve other client populations. Our outreach to these populations broadens the base of people who engage the career pathways that lead to agriculture and food jobs.

- Finally, we would recommend that the Plan focus on the benefits of apprenticeships, rather than simply job placement programs, as a method of developing a high-quality agricultural workforce. Page 43 of the Plan provides details on a PDA outreach effort to urban farming groups that led to discussion of, among other topics, the development of formal agricultural apprenticeship programs.

In discussing the details of potential apprenticeship programs for agricultural workers, having the opportunity to use such programs to provide pathways for farm workers to ultimately attain technological, managerial and crew leadership positions should be the primary goal. Such an orientation will make these programs more attractive and precisely targeted than simply apprenticing a participant to a farm worker without additional opportunities for career development and advancement. At the same time, if there are opportunities for worker certification in certain skill areas, highlighting those opportunities would be beneficial. These positions need to provide a path to obtaining specific skills and motivation for workers to stay with the program.

Response: PDA is actively involved in the development of three apprenticeships that lead to jobs in three of the in-demand occupations in the agriculture and food industry: agriculture equipment service technician, dairy herdsman, and organic farmer. We agree that apprenticeships will help us further define career pathways in a way that improves the content of other education and training possibilities within the career pathway. The focus on on-the-job training in an apprenticeship makes it distinct from other forms of adult education.

Gloria Haley of **Pennsylvania NCBA** offered multiple comments to include:

- NCBA Pennsylvania would have three (3) recommendations to add to or amend the Pennsylvania Workforce Innovation and Opportunity Act (WIOA) Combined State Plan.

The Pennsylvania Department of Aging (hereafter PDA) develop a partnership or assist the SCSEP programs in Philadelphia to develop a partnership with the Driver Training and Certification Department of the School District of Philadelphia to provide initial training for

SCSEP participants interested in acquiring a Pennsylvania School Bus Endorsement. Participants acquiring such an endorsement would also need to obtain a Pennsylvania commercial driver's license. To assist our participants in acquiring a commercial driver's license, perhaps PDA can help arrange for classes to prepare for the knowledge portion of the tests be given at the local One Stop or Career link centers in Philadelphia. This recommendation is in response to the 643 annual openings in the School and Employee Bus Transportation job classification in Pennsylvania and the statement that older workers would be a good fit for these jobs.

Response: PDA will contact PennDOT to explore the availability of classes to prepare individuals for the knowledge portion of the test for a Commercial's Driver's License as well as possible locations to administer the test. PDA will also contact its SCSEP subcontractor in Philadelphia to discuss the feasibility of further exploring this recommendation with all four SCSEP providers in Philadelphia.

- The PDA assist the SCSEP sub-grantees to lobby to have the lack of computer literacy listed a Priority of Service category under Federal regulatory priorities of service. It can be reasonably presumed that the occupations in the commonwealth that require Short-Term On-the Job training (ST OJT), or Moderate-Term On-the Job Training (MT OJT), and High Priority Occupations (HPO's) all require increasing degrees of computer literacy. Both minority groups and seniors are statistically on the wrong side of the digital divide and require remedial efforts to bridge it. Naming lack of computer literacy as a priority of service category will bring focus and resources to bear to bridge the digital divide.

Response: The Priority of Service categories are set by federal law. PDA cannot change what is written into the law and clarified through regulation in the final rule. However, it should be noted that lack of computer literacy is assumed under the low employment prospects service priority.

- The PDA should increase the frequency of both online and in person meetings to coordinate SCSEP sub-grantees with the job training initiatives available locally and throughout Pennsylvania. Presumably, more frequent contact can encourage more partnerships between SCSEP sub-grantees and organizations providing training for our participants.

Response: PDA will convene periodic conference calls in FY 16-17 with all national SCSEP providers operating in PA to discuss local job training initiatives and other local best practices related to participant recruitment, CareerLINKS, host agency development, meeting performance measures, etc.

W. Michael Nailor of the **Pennsylvania School Librarians Association** commented: The Pennsylvania School Librarians Association (PSLA) represents nearly 900 teacher-librarians and school library educators around the Commonwealth. We applaud and endorse the thrust of the strategies found in the proposed WIOA Combined State Plan as posted on December 28, 2015. We ask that you consider the role of school libraries serving Pennsylvania's students and teachers as you transform this plan into effective programming to ready all in Pennsylvania for the workforce.

Pennsylvania's expressed goal to expand "the number of 'schools that teach' the skills necessary to succeed in college and careers" (p. 7) can be facilitated by the access to information and the information literacy skills to use that information that are provided in the 21st-century school library program.

A McKinsey study predicts that by 2018, the U.S. could face a shortage of 140,000 to 190,000 "people with deep analytic skills" able to access and use information. The faculty member at schools in our state who has the greatest investment in this information literacy process of accessing and using information is the teacher-librarian. Unfortunately, as Governor Wolf indicated in last year's budget message, recent budget cuts to Pennsylvania school districts have "left 56 percent of Pennsylvania students with no access to a full-time librarian" exactly at the time when quality school library programs and resources are needed more than ever to prepare Pennsylvanians for the workforce.

Increasing "opportunities for all youth to participate in work based learning through summer employment, pre-apprenticeship, apprenticeship, internships and other similar experiences" (p. 8) is an important goal – but can we send these students into field-based education experiences without access to quality information and the ability to analyze and use it? Modern knowledge management tools require workers to read, analyze and make good decisions about how to use that information. Solid school library programs offer students this kind of education from pre-school to graduation.

Information literacy - the ability to access and use information - is mission-critical to workforce development because it is the basis for wise decision-making and communication. It is more than, and should not be included in, the "soft skills" and "micro-credentials" mentioned in sub-goals 1.4, 1.9, and 2.6. The access and the appropriate use of information as taught in quality school library programs are critical thinking skills and macro-credentials. Including them in the document could assist in making this WIOA plan into a reality.

Response: We appreciate your comments about the role that school librarians play in developing a workforce that is information-literate and able to think critically.

Laura Saccente of the **Pennsylvania Statewide Afterschool/Youth Development Network (PSAYDN)** offered multiple comments to include:

- Formed in 2004, Pennsylvania Statewide Afterschool/Youth Development Network (PSAYDN) operates out of the Center for Schools and Communities (CSC) in Camp Hill, Pennsylvania. As a division of the Central Susquehanna Intermediate Unit (CSIU), a local education agency, since 1988, the CSC has been committed to improving outcomes for children and families through training, technical assistance, program evaluation, research and resource development. PSAYDN's mission is to promote sustainable, high-quality out-of-school time youth development programs through advocacy and capacity building to enhance the welfare of Pennsylvania's children, youth and families. Pennsylvania is one of 50 states that are part of the Charles Stewart Mott Foundation's funding of statewide afterschool networks.

PSAYDN works on various levels in Pennsylvania to provide the following supports for out-of-school (OST) programs: connecting stakeholders with strong local and state leaders to increase awareness and build support for affordable, quality afterschool programs; creating opportunities for collaboration through statewide, regional and local partnerships; and changing lives by helping Pennsylvania afterschool programs stay focused on high quality services.

According to the U.S. Bureau of Labor Statistics, it is estimated that by the year 2018, Pennsylvania will have over 300,000 jobs that will relate to STEM fields—over 50 percent that will need some level of post-secondary education. Recognizing these trends, PSAYDN implemented Project Accelerate, a program designed to strengthen systems building of high

quality OST Science Technology Engineering & Math programming. STEM education in OST programs can increase both interest in and aptitude for STEM fields and have positive impacts on students and Pennsylvania communities well into the future.

OSTs offer structured learning environments outside the traditional school day, through before- and after-school; summer; and extended-day programs. They provide a range of enrichment and learning activities in various subjects including arts; civic engagement; STEM and 21st century skills, such as critical thinking and literacy information. OSTs offer intentional academic support, mentoring and more. High-quality OSTs often engage participants through innovative, promising practices and diverse learning methods that complement what students learn during the school day. Each year, students spend approximately 20 percent of their waking hours in school and approximately 80 percent outside of school (National Center for Education Statistics). OSTs are part of a range of supports that can help youth succeed, along with positive influences from family, friends, school and other enrichment activities.

Response: The commonwealth appreciates the contribution which OST programs in general and PSAYDN in particular make to high quality programming for youth. In addition the commonwealth agrees that high quality OSTs are part of a range of supports that can help youth succeed, along with positive influences from family, friends, school and other enrichment activities. It is important to note, however, that OSTs are primarily funded through education funding. WIOA funding is targeted to workforce development, specifically to individuals who face barriers to employment. WIOA funding does not include funding for general education programs.

- PSAYDN is grateful for the opportunity to provide commentary for the Workforce Innovation and Opportunity Act's (WIOA) four-year state plan that outlines Pennsylvania workforce development strategy. PSAYDN strongly believes that OST programs involving partnerships with workforce development boards (WBDs), businesses, government, and private and community-based organizations enable K-12 students to explore post-secondary opportunities and build strong portfolios that align with workforce needs. OST offers activities that contribute to workforce development such as career interest inventories, career awareness, career exploration, mentoring, internships, and even career certifications, like badging, in high-demand fields. PSAYDN is pleased to see the commonwealth continuing to encourage Business-Education partnerships (bullet 4.6, page 17, 87) and recommends the connection of local businesses to OST programs.

Response: We appreciate the comment in support of Business-Education partnerships and agree that local businesses should be encouraged to connect to OST programs.

- Ongoing research has also demonstrated that participation in high-quality OST programs yields positive academic outcomes. OST programs help reinforce literacy and mathematics for students who are struggling by providing extra time and differentiated methods of instruction, such as project-based learning activities, to keep students engaged in school while building skills and progressing toward graduation, college, and the workplace. PSAYDN recommends that the state plan add to bullet 2.8 (p. 11) the informal education system as a potential partner.

Specifically, OST programs can assist with several of Pennsylvania's broad goals for the commonwealth's workforce development system, like "establishing career pathways, increasing

opportunities for youth and engaging employers through workforce partnerships. High schools are increasingly focused on ramping up student performance in basic academic skills—certainly a laudable goal. Many schools are not able, however, to provide opportunities during the school day for all students to learn about college and career options or to develop vital 21st century skills. Students from higher socioeconomic backgrounds can more easily access learning opportunities through networks of family, friends, and other options, but economically disadvantaged youth often have little access to these opportunities and services. Afterschool and summer learning programs can help the Commonwealth meet this goal.

Response: The commonwealth appreciates the contribution which OST programs in general and PSAYDN in particular make to high quality programming for youth. In addition the commonwealth agrees that high quality OSTs are part of a range of supports that can help youth succeed, along with positive influences from family, friends, school and other enrichment activities. It is important to note, however, that OSTs are primarily funded through education funding. WIOA funding is targeted to workforce development, specifically to individuals who face barriers to employment. WIOA funding does not include funding for general education programs.

- PSAYDN notes that WIOA no longer requires a Youth Council. These strategic planning entities are critical to directly link youth stakeholders and experts to decision making about funding and resource allocation, service implementation, performance measures, and reporting—ensuring out-of-school youth and low-income, in-school youth are adequately served across systems according to WIOA’s intent. PSAYDN is pleased to see that a specific initiative to support youth in the guidelines is the Youth Committee within the State WBD (bullet 3.3, p. 14) and local WBDs (p. 85). PSAYDN welcomes up opportunity to assist the Youth Committee by designating OST partners to help advise on programs and policy.

PSAYDN recommends the Department of Labor and Industry provide funding and technical assistance to local WDBs and its partners on how to leverage WIOA resources and build a comprehensive youth system that effectively serves vulnerable youth.

Response: We appreciate the offer to advise on youth policy. The commonwealth offers technical assistance to LWDBs upon request.

- As part of WIOA local unified/combined planning, PSAYDN recommends boards initiate the move from career pathways as special programs to career pathways as the workforce development system’s new way of doing business. One of the key changes in the Every Student Succeeds Act, signed by President Obama in December, is the requirement that state plans must include collaboration with a number of other departments and programs. Some of these include the Perkins Career and Technical Education Act, the Workforce Innovation and Opportunity Act (WIOA), and the Adult Education and Family Literacy Act (AEFLA). This represents an important change from NCLB where state Education departments typically operated more independently in developing state plans. PSAYDN recommends a clear vision in the state plan on the collaboration with the various state agencies for successful career pathway models from Pre-K through college/career.

Response: The commonwealth appreciates the comment and the reference to state plans and will work to include this strategy in the planning and development of the state plan required under ESSA.

- Included in Title IV of ESSA is the “21st Century Schools” section, where funding is available for career and college readiness programs/services to be coordinated between schools and with community-based services and programs. These projects may be partnerships with higher education institutions, business, nonprofits, community-based organizations, or other public or private entities, including workforce development boards. As WIOA youth programs are shifting toward a focus on out-of-school youth, the 21st Century Schools funding may give workforce development boards additional opportunities to collaborate and leverage resources for in-school youth services that WBDs deem to be important to maintain.

Response: We appreciate the suggestion and will encourage local workforce development boards to consider these resources.

- Generally, PSAYDN recommends competitive grant opportunities, when appropriate, be open to OST/informal learning entities to assist with regional economic development strategies.

Response: The commonwealth recognizes the value of the work done by the commenter and other OST programs. It is noted however, that WIOA funds are generally directed to out of school youth rather than the larger population of students who participate in OST programs. Other competitive grants may become available that are more suitable for OST programs and do not have WIOA's legal restrictions.

- These recommendations and examples make clear that afterschool and summer learning programs can develop strong partnerships with workforce development boards, K–16 education institutions, employers, museums, and community-based and youth-serving organizations in order to create stronger connections to college and careers. Given their prevalence in communities across Pennsylvania and their ability to be flexible and responsive to community needs, afterschool and summer learning programs are well positioned to provide youth, particularly underserved youth, with opportunities to be college and career ready. PSAYDN looks forward to the ongoing process and opportunities to partner with workforce development boards.

Response: The commonwealth appreciates the value of the after school and summer time programs and the contribution such programs make to helping students be college and career ready.

Jeff Iseman of the **Pennsylvania Statewide Independent Living Council** offered multiple comments to include:

- CILs-We appreciate the L&I OVR comments to expand its’ work with the Centers for Independent Living (CILs) in additional areas, particularly increasing community employment (particularly with youth), addressing ADA compliance in PA Career Links and grant opportunities. CILs are open to additional opportunities in working with L&I to further promote Independent Living (IL).

Response: We agree that the CILs are a valuable partner and will include the CILs in the section on partner programs.

- Career Links and ADA Compliance- PA SILC appreciates the efforts made to contract with CILs to address this issue. The accessibility regarding Career Links has been ongoing issue. Advocates just last year celebrated the 25th anniversary of the Americans with Disabilities (ADA). Our understanding is that all programs and services under WIOA offered by L&I are to be both physically and programmatically accessible. We recommend that L&I redouble their efforts make all PA Career Links accessible by the end of this plan.

Response: We appreciate the comment and support the requirement under Section 188 for all PA CareerLink® centers to be physically and programmatically accessible for all job seekers, including individuals with disabilities.

- L&I OVR and Community Health Choices (CHC) - Most consumers who currently and would receive physical disabilities services through PA Department of Human Service (DHS) Office of Long Term Living (OLTL) -with the exception of Act 150 consumers and a few other target populations- will be receiving services through a managed long term care system, also known as Community Health Choices (CHC). We ask that the PA L&I WIOA plan put forth specific proposals on how this will work between OVR and DHS OLTL. PennDOT is also to have a role here. Managed Care Organizations (MCOs) will have a role in supporting and employing people with disabilities, so it's important that there is strong collaboration between OVR, DHS OLTL, PennDOT, MCOs and the disability community.

Response: DHS is currently developing requirements for its CHC initiative and increasing competitive integrated employment outcomes for CHC participants is a priority for DHS.

- Increase involvement of L&I stakeholder groups in the process of policy making prior to putting forth proposals- There is commentary here on the roles of Pennsylvania Rehabilitation Council (PaRHC), State OVR Board and to a lesser degree, PASILC. While updates are certainly appreciated by all stakeholder groups, it is too often that policies and budget matters are already decided prior to sharing the information. We ask for each of these organizations to be included in the inception of programs and policies as well as being provided greater opportunities up front for comments of possible changes to existing L&I policies and budget matters where possible.

Response: We appreciate the comment and encourage stakeholder collaboration and communication.

- Strongly increase efforts to address transportation gaps both through L&I and cross agency efforts- In 2013, Pennsylvania passed Act 89, which addressed funding for all modes of transportation. In 2015, the US Congress and President Obama passed the Fixing America's Surface Transportation (FAST) Act. While these do not address all transportation needs, both provide additional resources not previously available. In addition, Pennsylvania is moving toward a managed long term care system (CHC) which should save funds and where MCOs will have a role in supporting individual transportation. We ask that L&I strongly collaborate with

Pennsylvania Department of Transportation (PennDOT), DHS and MCOs where possible to increase employment opportunities. Since more individuals will be paying taxes at all levels of government, this would be a win –win for all stakeholders involved. This should include efforts to increase accessible transportation options and support in all venues. Lack of accessible transportation is an issue that we hear about in all regions of PA. It is particularly a challenge in areas where para-transit providers don't cross county lines (although this is supposedly being addressed in Act 89 as we speak) and providing transportation during non-traditional hours (evenings, weekends, and holidays) when people need to work. The majority of PA's high speed rail stops (Amtrak, Southeast Pennsylvania Transportation Authority (SEPTA) and Port Authority Transit (PAT-Allegheny) aren't accessible, but efforts are slowly being made to address this issue prior to and now through both Act 89 along with the new federal funding in the FAST Act. There are also efforts to increase the amount of accessible taxis and Transportation Networking Companies (TNCs-Uber, Lyft) which could also provide additional transportation options.

Response: We appreciate the comment and support efforts to address transportation gaps.

- Strengthen the role and include people with disabilities in all of Pennsylvania's Workforce Investment Boards (WIBs)- Too often, we hear that people with disabilities are not provided a seat at the table for regional WIBs. Since the employment rates of people with disability rates are lower than any other population, we suggest that every WIB have at least one person with a disability who has been a user of OVR services or an individual who has worked in disability employment services.

Response: We appreciate the comment, but note that local elected officials make appointments to LWDBs.

- Include additional support efforts in all career paths for people with disabilities- While there have been improvements in recent years, there is still too much tunnel vision in terms providing greater employment opportunities for people with disabilities in all fields. There are efforts to increase employment in Science Technology Engineering and Math (STEM) and through PA Project Search sites (healthcare focus). We would like to see additional community and traditional colleges, universities and trade schools are included in disability partnerships. For employment, we would suggest additional collaborations with Geisinger, Allegheny Health Network, Highmark / Blue Cross organizations (both statewide and regional) and other community health systems that do not current partner with OVR.

Response: We appreciate the comment and promote efforts to increase employment in STEM careers.

- Earlier and stronger inclusion of PA Department of Education (PDE) and greater inclusion of all public and private schools across PA in working with OVR, including greater inclusion efforts- There seems to be an inconsistency in the role of PDE and local schools (both public and private) in terms of addressing career opportunities. WIOA has called for increased collaboration between OVR, PDE and disability stakeholders to address youth with disabilities in school and out of the education system. The Governor has made it a priority to increase investment in both education and OVR. We believe that greater efforts need to occur on the local levels for successful partnerships, including, but not limited to greater inclusion efforts. Combined with

the additional resources noted for the various plans, increased inclusion opportunities would help to inspire more people with disabilities to reach for greater career opportunities and increase independence.

Response: We appreciate the comment and support continued collaboration and partnership between OVR and PDE.

- Increasing awareness of OVR resources and support for Veterans with disabilities- OVR did a Memorandum Of Understanding (MOU) with the Federal Veterans Administration (VA). While it appears that more has been done and PA Career Links have a PT or FT staff providing veterans supports on a regular basis, awareness with veterans of OVR services could still be improved thorough increase outreach with veterans' organizations and local governmental agencies supporting veterans. Some CILs have also hired veterans with disabilities. We would encourage your local OVR and Career Links to reach out to them for collaborative efforts.

Response: We appreciate the comment in support of this effort.

- Employment First- We applaud OVR's efforts on employment first, but ask that greater efforts are made up front to include the disability community and stakeholder organizations in the development of Employment First.

Response: We appreciate the comment and will engage stakeholders as we implement Employment First.

- Increased Disability Hiring (Reforms to State Civil Service Commission (SCSC) and Office of Administration (OA)- We applaud efforts here but ask that you collaborate with the disability community and stakeholder organizations in changing policies and practices that have made it difficult for people with disabilities to obtain employment opportunities with the state of Pennsylvania. We would also ask that a preferential hiring system be developed for people with disabilities similar to that already in place for veterans. An expedited employment policy would make great strides in lowering the abysmal unemployment rate of people with disabilities.

Response: We appreciate the comment in support of this effort and suggestions to improve current efforts.

- Additional Funding for OVR- We commend the Governor and Legislature in supporting state additional funds to draw down the federal match. This needs to be done on an annual basis to address both OVR system capacity and disability employment needs, particularly with the move away from segregated and sheltered employment settings as required by WIOA.

Response: We appreciate the comment in support of this effort.

- Increased involvement with OLTL- There has been recent efforts to increase the partnerships between OVR and OLTL. We commend these efforts and ask for them to continue and expand, for both the current Home & Community Based Services (HCBS) and future CHC systems.

Response: We appreciate the comment.

- Additional partnerships with OVR, state and local PA Chambers of Commerce (COC), National Federation of Business (NFIB) and disability stakeholders- We acknowledge that some partnerships exist with some COCs, OVR and local/ state disability stakeholders, but more is needed. Greater partnerships could help the private sector to fill more of open positions with people with disabilities seeking employment.

Response: We appreciate the comment on the importance of partnership and business engagement. As part of DCED's business engagement plan, OVR information will be distributed.

- Greater support and collaboration for Deaf-Blind Population- In PA SILC's current State Plan for Independent Living (SPIL), we have a grant in collaboration with OVR and the CIL of Central PA as a pilot to provide some greatly needed supports and services for the Deaf-Blind population. While this effort has provided a great start, much more is needed. We encourage increased financial support through L&I OVR, DHS, PennDOT, MCOs and other stakeholders to increase ongoing and sustainable services and supports for the Deaf-Blind population that would reach all areas of Pennsylvania.

Response: DHS is aware of the current demonstration program being undertaken by OVR with its partners to provide Supportive Services to Pennsylvania's deaf-blind population. DHS is willing to discuss the results/findings of the demonstration project with OVR when the time comes to determine whether and how DHS could support this population to remain independent in the community.

- Increased support for minority or diverse disability populations- In PA, we continue to see growth in minority populations, particularly Hispanic and Asian communities in Central and Eastern PA. We support additional resources, including bi-lingual staff to address populations where English as a Second Language (ESL) is an issue. We also have large Amish populations, scattered in various regions of PA who could benefit from OVR services. CILs could be helpful here, as a number do outreach to these populations. We would also support the idea of deeming the disability community a minority in terms of employment status rather than that of just a targeted group.

Response: We appreciate the comment.

- Sustainable rates to Supportive Employment (SE) and other employment programs- Rates is an issue for any provider of services, including CILs and other disability organizations. OVR's rates on Supportive Employment are much lower than rates for employment supports available through DHS ODP. We ask for greater parity and increased rates to promote sustainable employment supports, including, but not limited to SE.

Response: We appreciate the comment. OVR is currently revising its Supported Employment Policy and investigating the agency's rates for employment supports and how they compare to those available through DHS ODP which are much higher than our resource capacities. Notwithstanding the rate amount, we agree that, where feasible and appropriate, DHS and

OVR's supported employment service definitions and approaches to reimbursements should be aligned.

- Greater Flexibility regarding educational and experience in addressing OVR staffing needs- We understand that there have to be minimum requirements to meet federal and that PA has additional requirements for OVR Counselors. We ask that OVR consider additional degrees, vocational background and life experiences in addressing its staffing needs, including, but not limited to counselors.

Response: We appreciate the comment, but do not agree with the recommendation. Both the statute and the proposed regulations maintain the language about the establishment and maintenance of personnel standards that are consistent with any national or state approved or recognized certification, licensing, registration, or other comparable requirements that apply to a particular profession. OVR contends that the new language contained in the 2014 Amendments regarding the education and experience requirements that would allow for the attainment of a baccalaureate degree plus one year of relevant job experience do not apply to the category of vocational rehabilitation counselor. This is based on the acknowledged fact that a national certification exists for this profession (Certified Rehabilitation Counselor), and that many states like Pennsylvania have counselor licensure laws. Both the national certification and state licensure laws require a Master's degree as the minimum qualification for a vocational rehabilitation counselor.

- Support for Assistive Technology (AT)- We support L&I OVR addressing the AT needs of individuals in Pennsylvania.

Response: We appreciate the comment.

- Addressing Home Modifications and the need for a consistent policy- It is our understanding that home modifications are available to individuals to maintain community based employment (both in the community and for home based business). We ask for support, clarification and greater collaboration efforts to meet this need to increase community employment.

Response: We appreciate the comment. OVR must apply the current policy as written. Per OVR policy number 13-200.03, work and home site modifications are services that should enable individuals to achieve a competitive integrated employment outcome. OVR's work and home site modification policy and guidelines are designed to assist the counselor and customer to jointly determine when sponsorship of this service is appropriate. OVR is obliged by law and regulation to provide only those disability-related modifications that are (1) necessary for successful completion of the consumer's rehabilitation program, and (2) performed in the most cost-effective way possible.

- Employment Discrimination- We support efforts to address employment discrimination as it relates to the disability community and ask for increased efforts to raise awareness of existing resources. We hear it's difficult for individuals to understand which governmental agencies to turn to for obtaining help here.

Response: We appreciate the comment and note that complaints can be filed with the Pennsylvania Human Relations Commission.

- Continue and increase social media presence- We support OVR's efforts into social media and encourage additional efforts where possible, particularly to increase awareness of employment resources.

Response: We appreciate the comment.

- Transition and training of individuals coming out of the Correctional System- It is estimated that at least 20% of individuals incarcerated in correctional facilities on a long term basis have some sort of disability. We appreciate efforts in helping these individuals to transition back into the community where possible and ask that you look to CILs as a community resource here.

Response: We appreciate the comment in support of the plan.

Kristin Ahrens of **Person-Driven Services and Supports Coalition** offered multiple comments to include:

- The Person Driven Services and Supports (PDSS) Coalition is made up of people with disabilities, family members and 50 organizations including: Disability Rights Network of PA, PA Developmental Disabilities Council, the Institute on Disabilities at Temple University; PA Health Law Project; PA Mental Health Consumers Association; Center for Independent Living of Central PA; Mental Health Association of Southeastern PA; Values into Action-PA, Mental Health Association in PA, National Alliance on Mental Illness of SW PA, Acquired Brain Injury Network of PA, The Arc of PA, PA Statewide Independent Living Council, and Self-Advocates United as 1.

We respectfully submit the following recommendations to the Department in relation to the WIOA Combined State Plan.

In Pennsylvania over 12,000 adults with disabilities of working age self-direct at least one of their home and community based services. Some of these self-directed services are supporting people to find or maintain jobs. The PDSS Coalition urges the Department to (1) consider adding a self-directed option for services through OVR and (2) consider investing in training for peer services which will expand employment opportunities for adults with disabilities.

Response: We appreciate the comments and recommendations.

- Recommendation 1: OVR should provide a self-directed or "person-driven" option for people to receive their Individualized Plan for Employment (IPE) services and supports. Self-directed or person-driven models of service can not only improve quality of life and leave people with fewer unmet needs, but can also save money : Instead of "packages of service" designed by the system, (even if a person doesn't need that level of support), people can blend paid and unpaid services and buy just the support they need.
 - The person takes on many of the responsibilities otherwise performed by agency staff, so costs can be lower.
 - If offered flexibility with funding, people can have the option to purchase generic services and supports which can replace sometimes costly and unnecessary special

services. An example would be someone paying a neighbor for mileage to drive them to work instead of hiring a specialized transportation service. Another example is small woman needing a cushion for her wheelchair. Instead of obtaining 3 bids for a specialized cushion, the woman could purchase a non-specialized cushion from a department store which would work well in her situation and save money.

- In person-driven services, people can use informal supports, like friends, co-workers, family or neighbors. This can help with the shortage of traditional providers and offers cost-saving opportunities.

Through its participant-directed supports option, the Office of Developmental Programs currently allows people to directly hire and manage job developers and/or job coaches. This option allows people flexibility and cost-savings of a minimum of \$43/hr of service. In this model (as long as the employer supported this arrangement) a co-worker who is not on shift could provide job coaching to a person with a disability. This type of arrangement not only saves money but offers a more natural supportive arrangement on the job for the person with a disability.

For some people with disabilities, once OVR funded support concludes, a home and community-based waiver picks up the cost of job support. If OVR were to allow for people to self-direct and directly hire and manage their job supports, there could also be more fluid transitions to these waiver funded support for people who require long-term job support.

In terms of the infrastructure necessary for the mechanics of a self-directed option, the Commonwealth holds contracts with multiple providers of financial management services that act as a payroll and billing agent on behalf of the state as well as ensuring that worker qualifications are met and workers compensation coverage is provided.

Response: OVR provides every opportunity for an eligible customer to make informed choices about their vocational goals and services they receive. DHS believes self-directed models are very good models that promote independence and self-determination. OVR promotes the use of natural supports and continues to explore how they can be best developed and implemented.

- Recommendation #2: Peer support services, by their very nature, create employment opportunities for adults with disabilities. OVR should support capacity building efforts for peer provided support services.

Not only do peer support services provide employment opportunities, but also there are some health advantages for people engaged in these models. Research shows that some of the advantages to peer support included increases in physical activity, medication adherence, and the largest increase in reported physical health related quality of life.

In the past OVR funded an advanced training for certified peer specialists (CPS) which essentially created a cohort of CPSs that were specially trained to support people with intellectual and developmental disabilities (I/DD) in their wellness and recovery. There is a tremendous need for CPS for people with I/DD and developing a pool of people available to offer this service offers greater employment opportunities for adults with disabilities. Without the OVR funding, this specialty training has not continued. We urge the Department to provide funding to train new cohorts of CPS trained in supporting people with I/DD and co-occurring mental illness.

Response: OVR continues to provide funding to support eligible individuals with disabilities in Certified Peer Specialist (CPS) Training. OVR representatives continue to support efforts to develop additional CPS training models to serve specific populations including individuals with I/DD and youth. OVR continues to counsel eligible individuals with disabilities who may be interested in work as a CPS on this type of opportunity.

- Additionally, another peer service model that is available through home and community-based waivers is a “Supports Brokering Service.” Unfortunately, there are very few providers of this service. Currently a number of the active supports brokers are either people with disabilities or family members of people with disabilities. The PDSS Coalition believes with some outreach and availability of training in Supports Brokering, this could be a great employment opportunity for adults with disabilities. Again, we urge the Department to provide funding to recruit and train adults with disabilities as Supports Brokers.

Thank you for the opportunity to provide input regarding the WIOA Combined State Plan. Members of the Person-Driven Services and Supports Coalition would welcome the opportunity to discuss our recommendations with the Department. We would also be happy to answer any questions or provide additional information.

Response: As OVR continues to develop its collaborative relationship with DHS/ODP/BAS/OLTL, the agency will continue to explore and consider various service delivery models, employment opportunities and training options that will improve competitive, integrated employment outcomes for individuals with the most significant disabilities.

Philadelphia Works offered multiple comments to include:

- We are pleased to submit the enclosed feedback to the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan. The Commonwealth has clearly gone to great lengths to develop and identify workforce goals for Pennsylvania that provide many core strategies for workforce areas across the state and we thank you and your partner agencies for such incredible dedication. We appreciate the depth and breadth of thought and input devoted to establishing the five broad goals and agree that they are essential to developing an effective statewide system.

In general, we believe the state plan offers tremendous opportunity for the Commonwealth to achieve at unprecedented levels. We also appreciate the Commonwealth’s vision as stated in the plan and its emphasis on those with significant barriers to employment specifically because of what this means for many Philadelphians. The plan recognizes the unique nature of customer needs and Pennsylvania’s 23 local areas. Overall, we believe that if certain areas of the Combined State Plan offered additional flexibility, we may better achieve the state’s goals of offering a workforce system that works for evolving employer and job seeker needs.

Thank you again for work and continued partnership so that we may support your goal of providing schools that teach, jobs that pay and government that works for all of Pennsylvania.

Response: We appreciate the comments in support of the five broad goals and note that the State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved.

- Philadelphia Works appreciates the WIOA-driven components that are present throughout the state plan and share in support for the state's vision for the workforce system in Pennsylvania as articulated in the plan's five broad goals. Establishing career pathways, investing in talent for targeted industries, increasing work-based opportunities for youth, engaging employers to strengthen connections across multiple systems and better utilizing data and increased data sharing are strategies that will certainly support and advance our organization's work to advance Pennsylvania's success.

Response: We appreciate the comment in support of the vision.

- We would like to take some time, however, to share concerns and specifically discuss how some of these policies may impact our ability to meaningfully achieve the goals that the commonwealth has outlined. We appreciate the recognition in the state plan regarding the "uniqueness of Pennsylvania's 23 local areas" (p. 88). Because of the state's diversity and sheer size, it is certainly a challenge to develop a plan that responds to and accounts for industries and labor markets across Pennsylvania. As such, we believe it is critical to the success of our state that local areas receive sufficient flexibility and latitude to respond to the changing and evolving needs of employers and job seekers. It is through this lens that we respectfully offer the following issues for public comment in order of priority to our work.

Response: We appreciate the comment and note that the State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved.

- LOCAL FUNDING – Training Benchmarks: Training is certainly important but it is only one component of WIOA services and may not be the ideal solution for all job seekers or employers. As such, training should be driven by local employer needs rather than prescribed thresholds. We ask that the commonwealth reconsider setting these benchmarks as doing so may come at the expense of other important services, including the success of our PA CareerLink® centers, program staff reductions, fewer resources for business services, and other programs and services. If, however, the commonwealth opts to move forward with these benchmarks, we recommend the following:
 - Consider re-evaluating the benchmarks based on what is currently spent by our local areas and allowing us to incrementally transition towards an appropriate benchmark. In other words, rather than setting an annual percentage benchmark, set a percentage by which we must increase our training spending so that the benchmarks account for the diversity of each local area while ensuring that additional training dollars are being spent. Recommended Language: The commonwealth will establish benchmarks for how much WIOA Title I funding must be used for training by local areas to include a set-aside to be used for new and innovative approaches. In Program Year (PY) 2016, each local area will increase spending of their training dollars by X% and increase their spending by this percent each program year until PY 20XX.
 - Exclude dislocated workers and youth from the training expenditure calculation. While this may be the state's intent, the language in the state plan should explicitly address it. Recommended Language: The commonwealth will establish benchmarks for how much

WIOA Title I adult funding must be used for training by local areas to include a set-aside to be used for new and innovative approaches.

- Broaden the definition of training as much as possible to include additional types of training and training-related activities. Recommended Language: For purposes of this section, training includes all allowable training activities under WIOA section 134 as well as additional types of training activities including, pre-apprenticeship, pre-vocational, entrepreneurial, paid work experience, internships, transitional jobs, short-term training offered by private providers and industries, workforce preparation activities that increase job readiness, work-based training and other types of training not provided by formal educational institutions.
- Exclude the administrative portion of Title I contracts when calculating the denominator for training expenditures, mirroring the structure for calculating the 75% out-of-school youth minimum expenditure requirements. Recommended Language: The training expenditure rate is calculated after excluding 10% of local administrative expenditures.
- Finally, in pursuit of WIOA and the commonwealth's goal of system connectedness and alignment, allow training to include funds from other sources such as:
 - One-stop partner program training expenditures for participants dual enrolled in the one-stop partner program and WIOA;
 - Discretionary grants (American Apprenticeship, NEG, H1-B, Workforce Innovation Fund, Rapid Response, National Dislocated Worker training); and
 - Related costs such as registration, books, lab fees, required uniform, and applicable staff/center time, etc.

Recommended Language: LWDBs may use other sources of funding, including Industry Partnership, TANF, discretionary grant funding, to count toward and offset the Title I training targets as well as costs related to and required for training such as registration, books, lab fees, required uniforms, administrative costs, etc.

We believe the inclusion of these options will still help achieve the Governor's goal of targeting 85,000 individuals per year through Department of Community and Economic Development (DCED) and Labor & Industry (L&I) training programs. Additionally, we would value an opportunity to hear more about the rationale behind these benchmarks so that we may offer alternative opportunities to advance the best interests of both the state and local workforce systems. We also appreciate the inclusion of technical assistance and ask that regardless of the outcome for this provision, the state continue to support the work of local boards through technical assistance.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets. We also note that administrative funds will not be used when calculating the training benchmarks.

- **LOCAL FUNDING – Transitional Jobs:** Transitional jobs are a new program component under WIOA and the federal proposed rules stated that local areas may reserve up to 10 percent of their total adult and dislocated worker allotments for transitional jobs. We urge the commonwealth to adopt DOL's position and allow local boards to determine whether and how much funding to dedicate to transitional jobs programs versus other interventions for certain targeted groups, such as work experience.

Recommended Language: LWDBs and PA CareerLink® centers may use between 5 percent and 10 percent of their funds to provide transitional jobs, as permitted under Section 134(d)(5) of WIOA, and ensure that priority of service for transitional jobs, if applicable, is afforded to individuals who qualify.

Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs.

- **LOCAL FUNDING – Priority of Service:** Comments: We anticipate that this benchmark will limit our ability to address the unique needs of our communities. This also may have unintended consequences as areas may resort to withholding services from those who do not qualify for priority of service to achieve the 70% mark if that local area cannot find adequate demand. However, if the commonwealth determines that setting a benchmark would be in the best interest of each local area, we offer the following:
 - Consider delaying implementation of this provision for a year (or more) so that we can understand priority of service needs throughout the commonwealth. Then, implement one of the following options:
 - Allow local boards to establish the percentages themselves based on analysis of initial program year data as LWDBs have an intimate understanding of their local area's needs.
 - Apply the initial program year's data for determining the baseline goal that local areas should seek to attain rather than starting with a benchmark immediately.
 - Encourage self-attestation. When enrollment of an individual into priority of service hinges on documentation, we are faced with a significant burden, especially when these individuals are many of the most vulnerable and may not have regular and easy access to documentation.

Further, from a technical and implementation perspective, this strategy requires the development of appropriate reports to allow local areas to monitor this metric locally so that we can take action prior to the need for technical assistance. We also ask that the state offer more regular frontline staff training so that relevant information is accurately captured.

Recommended Language: As priority of service has been greatly expanded through WIOA, in order to establish a baseline by which the priority of service benchmark should be calculated, the commonwealth will utilize the first program year for evaluation to ensure that benchmarks are informed by practice. The commonwealth will support LWDBs ability to monitor data to determine the percentage of those served who are individuals with priority of service by developing a reporting template. This program year data will be applied by each local area to determine an appropriate percentage. Using the method of reporting developed by the commonwealth, LWDBs and PA CareerLink® centers will ensure that they are meeting this percentage of clients who qualify for priority of service. Should this percentage be less than this percent, the commonwealth shall provide the LWDB or PA CareerLink® center with technical assistance to ensure that effective affirmative outreach efforts to individuals with priority of service are made.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams

and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- State Plan: (p. 67) The commonwealth, LWDBs, and PA CareerLink® centers shall provide priority for Title I individualized career services and training services...

Comments: As a technical amendment, this language should clarify that this applies only to Title I Adult services and not dislocated worker services. We believe this was the state's intent but a statement to that effect would help resolve any uncertainty.

Response: We appreciate the comment and agree that the 70% requirement does not apply to dislocated worker services and will make that clear in the state plan.

- State Plan: (p. 70) LWDBs and PA CareerLink® centers must obtain permission from the commonwealth before transferring Title I-B funds allocated to the Adult Program to the Dislocated Worker Program and to demonstrate before doing so that goals for serving groups entitled to priority of service have been met.

Comments: We ask the commonwealth to offer a clear means to demonstrate that goals for serving groups entitled to priority of service have been met in the event the need arises. They should also provide standard and sufficiently clear documentation requirements to make the case.

Response: We appreciate the comment and will take it under advisement as policies are developed.

- EFFECTIVE ENGAGEMENT OF AND SUPPORT FOR THOSE WITH BARRIERS TO EMPLOYMENT: We value the emphasis throughout the plan on those with barriers to employment because of what this will mean for many Philadelphians and Pennsylvanians. Strategies such as "mainstreaming job seekers with barriers to employment to the maximum extent possible" (p. 9) are especially effective as it will not only ensure that targeted populations will benefit from the implementation of strategies such as career pathways but it will also help reduce redundancies across systems and departments. Again, in order to fully advance the success of the commonwealth's goal, we offer the following comments.

Response: We appreciate the comments.

- State Plan: (p. 9) The commonwealth will also support placement of individuals with barriers to employment into quality entry-level jobs that provide the work experience and non-technical skills necessary to lead to employment in HPOs, and we will consult with LWDBs and engaged employers to identify the career pathways for which such quality entry-level jobs can serve as "on ramps."

Comments: This provision offers an important result that we support. However, the larger strategy should include some acknowledgment that not all of those with barriers will be ready for career pathways as other areas of the plan address (i.e., p. 10: 1.9). Sometimes an effective "on-ramp" is the best solution even if it means we are getting someone to work for 23 weeks because it may advance that individual towards the end goal of quality employment.

Recommended Language: The commonwealth will also support placement of individuals with barriers to employment into entry-level jobs that provide the work experience and non-technical skills necessary to lead to quality employment in HPOs, and we will consult with LWDBs and engaged employers to identify the career pathways for which such entry-level jobs can serve as “on ramps.”

Response: We appreciate the comment but are unsure where the commenter wishes for us to incorporate the language, which, as noted, is included on page 9 of the plan under Goal 1.7.

- State Plan: (p. 15) Low-quality jobs have high turnover rates and limited opportunity for advancement, bringing into question the return on investment of limited WIOA resources.

State Plan: (p. 16) The commonwealth will critically consider job quality in engaging employers and will require LWDBs to prioritize funds to be used for business services activities, on-the-job training and incumbent worker training to those employers offering high quality jobs. The commonwealth will seek to include model criteria for considering job quality in the standardized On-the-Job Training (OJT) contract described in paragraph 4.9 below. The commonwealth will also use these criteria to target Industry Partnerships and similar state- funded workforce partnerships to employers that offer high-quality jobs or jobs that are likely to lead to high-quality jobs.

Comments: While we understand the emphasis on high-quality jobs, certain populations such as out-of-school youth might be challenged to find a quality first job and may need further assistance prior to reaching a “high quality job.” The term “low quality jobs” undermines the effort of each individual’s achievement related to their current capacity. The quality of a job should be relevant to the skills that an individual can develop in a given work environment. In reality, any work experience, while it does not fall under the “high-quality jobs” category, might help job seekers move forward with their education and help them set career goals. Additionally, some jobs include automatic increases based on a labor management or apprenticeship agreement but may not initially meet the high-quality job standard for at least a year or more. We believe a critical emphasis on only job quality would exclude other jobs that are important to our job seekers.

Recommended Language: The commonwealth will balance job quality in engaging employers with the need for effective on-ramps when prioritizing funds to be used for business services activities, on-the-job training and incumbent worker training to those employers offering high quality jobs and jobs that may lead to high quality jobs. The commonwealth will seek to include model criteria for considering job quality in the standardized On-the-Job Training (OJT) contract described in paragraph 4.9 below that encompasses jobs that may lead to quality jobs. The commonwealth will also use these criteria to target Industry Partnerships and similar state-funded workforce partnerships to employers that offer high-quality jobs or jobs that may lead to high-quality jobs.

Response: We appreciate the comment, but regrettably feel there are “low-quality jobs” and we are trying to reduce the number of them.

- State Plan: (p. 46) The commonwealth also recognizes the need to provide supportive services to customers, particularly those with barriers to employment, in order to promote successful outcomes. While many of these supportive services can be provided by the core programs, other services must be secured through partner programs and community and faith-based organizations.

Comments: This provision is an important acknowledgment that supportive services are oftentimes critical to a job seeker's success, especially those with barriers to employment. In order for this goal to be fully achieved, the commonwealth must make sufficient funding available across all programs to have a good outcome from leveraging programs. Otherwise we are shifting the burden to partner programs and, as a result, serve fewer and fewer residents in order to meet minimum standards. Rather than requiring this, the plan should encourage it because LWDBs ability to secure services through partner programs is contingent on sufficient funding of other programs, an area we have no control over.

Recommended Language: The commonwealth also recognizes the need to provide supportive services to customers, particularly those with barriers to employment, in order to promote successful outcomes. While many of these supportive services can be provided by the core programs, local boards are encouraged to secure other services through partner programs and community and faith-based organizations based on local needs.

Response: We appreciate the comment and utilized the recommended language in the plan.

- YOUTH State Plan: (p. 84) Considering the tailoring of strategies for young adults by age group, 18-21 and 22-24... An emphasis on available work experiences and employment services, rather than education and basic skill building, is preferred for this older group.

Comments: We seek to engage youth of all ages by emphasizing and prioritizing education that is connected to work experiences rather than experiences and employment services exclusively. Finding employment may be challenging for older youth and/or younger adults with low literacy and numeracy levels. We recommend including language that clarifies that older, low-literate youth and young adults should have access to both education and employment-related services, including blended and integrated models.

Recommended Language: . . . for this older group. When older youth and young adult clients have low literacy and numeracy levels, however, local areas should consider integrated, contextual strategies that blend work experience and education.

Response: We appreciate the comment and have added the suggested language to the plan.

- State Plan: (p. 85) If a participant disengages from the program at any point, calls, texts, visits and messages on social media are ways to find out why the participant is no longer engaged and let the participant know that he or she can return whenever he or she is ready. Engage adult mentors along with case managers. Such mentors can play a key role in keeping participants engaged with the program.

Comments: In many cases the most intensive efforts will not be enough for youth and young adults to reengage. In an effort to promote a method of effective outreach that weighs the

availability of provider resources with realities that have been tested by practice, the commonwealth should consider extending the time period to reestablish eligibility from 90 days to 180 days and offering a clear definition of what qualifies as sufficient outreach.

Recommended Language: . . .with the program. If sustained, documented efforts have been made to re-establish contact over a 180 day period, then the local board will have met its responsibilities.

Response: We appreciate the comment and will take it under advisement as policies are developed.

- State Plan: (p. 14) The commonwealth will encourage the co-enrollment of high-risk OSY, ages 18 to 24, as both WIOA Adult and WIOA Youth participants to allow for the leveraging of funds and provision of necessary services. Where appropriate, co-enrollment in Title II adult basic education services, EARN, TANF and other partner programs will also be encouraged.

Comments: Locally, PA CareerLink® centers do not have the current capacity to address the unique needs of older youth. We have found that younger adult males produce lower performance in common measures data. With a coordinated inter-program effort, that includes sufficient training or youth-focused staff, to offer this groups the full array of services available, we will have the ability to better support this age group while helping common measures and aligning with state goals.

Recommended Language: . . .also be encouraged. To this end, the Commonwealth will support training models that help to equip center staff with the skills and knowledge they need to successfully work with and support older youth and young adults.

Response: We appreciate the comment and will certainly look for ways to support local areas in these efforts.

- State Plan: (p. 85) Recommending the design of a comprehensive community workforce development system. Comments: We appreciate the commonwealth's recognition of the important role that that youth councils serve. The design for the full workforce development system rests with the board and the CEO and this provision should be appropriately revised to reflect the focus of youth committees in relation to the LWDB.

Recommended Language: Recommending a design to incorporate youth into the community workforce development system.

Response: We agree with the commenter that the design of the system rests with the board and chief elected officials. We note that the section states that Youth Committee activities "may include" this provision and that the provision is merely recommending, not establishing the system design.

- DATA, PERFORMANCE AND THE COMMONWEALTH WORKFORCE DEVELOPMENT SYSTEM (CWDS): State Plan: (p. 31) WIOA Performance Goals for Core Programs

Comments: Since the measurement periods for the Employment, Retention and Median Earnings are new, historical data is unknown to local areas. The state must make this data available in order to allow for effective local negotiation. Because states and local areas are still transitioning to WIOA and participants enrolled prior to publication of the measures will be included in the determination of the WIOA measures next year, we respectfully request that consideration be given to lowering the targets for the performance measures to the baseline met by the state during its last year of performance under the Workforce Investment Act based on the following.

- The parameters for the calculation of the measures have not yet been issued by the USDOL and will not be issued until after the state plan is due.
- There are 3 new adult/dislocated worker measures, for which, there is no existing baseline established under previous legislation, upon which to estimate performance.
- There are 4 new youth measures, for which, there is no existing baseline established under previous legislation upon which to estimate performance.
- The method for calculation of all the WIOA measures will not be the same as under previous legislation.
- Data needed by states and local areas to manage performance is a challenge to obtain because it is partially based on the wage record, which is 9 months in arrears. As a result, course corrections cannot be made until the year after performance for the previous year has already been determined. Under WIOA, DOL will be working on improving reporting, as we enter into WIOA, however, we will still working under the current reporting system.
- The penalty to states for not meeting the WIOA measures can be as much as a reduction of 5% to the State's 15% portion of the grants (WIOA § 116(f)).

Response: WIOA presents many new performance measures and goals. For many, there is little or no baseline information. The targets as expressed in the plan represent a starting point for conversations among providers, partners, and policy-makers.

- State Plan: (p. 18) The commonwealth will embark on a comprehensive upgrade of the Commonwealth Workforce Development System (CWDS) and JobGateway® to provide for better job seeker and employer experiences and allow staff greater case management and performance accountability functionality within and across core programs. To the degree possible, the commonwealth will also look at ways to integrate CWDS with the case management systems of other partner programs.

State Plan: (p. 29) Refining the Commonwealth Workforce Development System (CWDS), the system of record used by the commonwealth to collect participant data and report performance outcomes, to allow for more effective case management for job seekers, employers and agency and partner staff. This will include attempts to integrate CWDS with the case management systems of other partner programs.

Comments: This would be a welcome change as it would allow for sharing information across programs, especially Title II providers and Title I providers as well as OVR, veterans and PHA. Linking CWDS to existing provider case management systems is an important direction for supporting greater access to and use of data among job seekers, employers and workforce professionals. Within the workforce professionals category, we recommend highlighting the importance of supporting access to data among both providers directly serving youth, as well as

intermediary providers that help to support youth providers in larger markets. From a procedural perspective, in order to offer a system of record that meets the need of the state's workforce system, we recommend the commonwealth begin with the best database or newest technology available rather than seeking to repurpose CWDS.

Response: Thank you for your input. The commonwealth has no plans to scuttle the CWDS system and we are planning to continue to evolve the system with technology updates. Many of the most recent changes have dealt directly with enhancing the case management system.

- State Plan: (p. 17) Investments in workforce development programs will be made based on data and return-on-investment analysis.

Comments: This provision should acknowledge that local areas must have advanced opportunities for input. Many LWDBs, including Philadelphia, are looking at calculation of ROI and both parties will benefit from advanced discussions around analysis methods.

Response: We appreciate your comment and look forward to receiving stakeholder input as we move forward with the development of this analysis.

- State Plan: (p. 18) The commonwealth will evaluate available data including how it is presented and released, to ensure that job seekers, employers and workforce development professionals have the information necessary to make informed decisions.

Comments: We are excited to see that data sharing and more effective use of data are a specific goal areas in the plan. To strengthen this section, we would suggest that the plan place more emphasis on the importance of real-time implementation data that can support greater understanding of program quality. By emphasizing program implementation metrics, providers and intermediaries have access to information that: (1) helps support program refinements, and (2) ensures that providers are supporting quality experiences for participants that are more likely to lead to achievement of common measures.

Response: We appreciate the comment and are committed to utilizing more real-time data where feasible.

- Overall, we ask as well that the state plan provide some more specific timelines by which these strategies are to be accomplished. Because the plan addresses a four year timespan, as we begin our own preparation, it would be helpful to see times by which some of these innovations may begin implementation.

Response: We appreciate the comment and as timelines are developed will share them as appropriate.

- State Plan: (p. 10) The commonwealth will require On-the-Job Training (OJT) and incumbent worker training, whether provided through WIOA core programs or the Industry Partnership program, to be tied to a career pathway.

Comments: Unless the pathway is already an employer-defined one, this goal may be difficult to document and achieve. If it were to be implemented, the commonwealth must be prepared to

document pathways prior to beginning an OJT and nimbly adopt WIOA-compliant career pathways. This strategy may also result in restricted funding to employers unless some flexibility is provided.

Recommended Language: The commonwealth will encourage that On-the-Job (OJT) and incumbent worker training . . . be demand-driven and complementary to a career pathway.

Response: We appreciate the comment and recognize that career pathways need to be defined and refined over time.

- State Plan: (p. 16) The commonwealth will specifically require LWDBs to provide funding to Industry Partnerships and other multi-employer workforce intermediaries that serve employers with common skill needs in their local workforce areas.

Comments: While we would encourage the Commonwealth to continue funding this important sector strategy, this provision would also be clearer with some additional information: Will this be through additional WIOA funding (in addition to the state funds)? If so, under what line item? How do we make the percentage for training under this scenario?

Response: The commonwealth envisions Industry Partnerships as a state/local partnership and therefore expect local financial support of IPs. The commonwealth is drafting a policy that will address the use of WIOA funds for incumbent worker training. We also note that the training targets have been revised to include support of IP training among the activities that count toward LWDBs' satisfaction of the training target requirements.

- State Plan: (p. 34) Provide advice, ideas and support on the development and implementation of the commonwealth's workforce goals and associated initiatives.

Comments: The LWDB represents areas across the commonwealth to ensure that the strategies of the state board are inclusive of the state's diversity. Accordingly, it is crucial that state board members have working relationships with their LWDBs and are able to speak to the local area's needs.

Recommended Language: Comment on commonwealth policy and guidance before it is implemented using local constituents as sources of feedback.

Response: We appreciate the comment and can share it with the State Board for consideration should they wish to amend their by-laws.

- State Plan: (p. 180) Individuals will be able to access WIOA services such as training programs aligned with a career pathway, an On-The-Job training program or a Transitional Job Program. Individuals with multiple barriers to employment are a priority under WIOA. This priority status will help individuals access the training services they may need to be employed.

State Plan: (p. 180) The PA CareerLink® centers will also help individuals participate in job fairs and other employer recruiting events. Individuals with multiple barriers will receive priority of service designation so training services can be readily available.

Comments: In order for this strategy to be fully recognized, state rules on EARN participants' ability to participate in training and federal rules on TANF core activities need to be re-evaluated.

Response: DHS will provide flexibility to participants who need additional training to access employment. DHS will not be able to change any federal rules that govern a participant's ability to participate in services beyond the legislated time limit.

- State Plan: (p. 221) The DOC proposes a collaborative partnership with the State Department of Labor & Industry via an REO workgroup.

Comments: This coordination on DOL reentry grants would be positive. We ask that L&I include LWDBs in the workgroup or through consultation to ensure that the local perspective is considered.

Response: We appreciate the comment and will consider inclusion of LWDBs in the workgroup.

- State Plan: (p. 94) Every PA CareerLink® center in Pennsylvania has an employee, who may have other duties, designated as the "Agricultural Specialist."

Comments: For Philadelphia, sharing an area representative makes more sense as the need is not as present. If each of Philadelphia's centers has such a representative, it would be an inefficient use of training resources.

Response: Please note that, according to the plan, the Agricultural Specialist may have other duties. These "Agricultural Specialists" are used for specific agricultural purposes and used only as needed. There is no duplication or redundancy of services, and therefore there is no additional incurred or inefficient use of training resources.

- State Plan: (p. 266) Competitive grants to multiple Industry Partnerships in a specific cluster (e.g., advanced manufacturing, health care, logistics and transportation) that agree jointly to develop and use sector-specific benchmarking tools that track the impacts of strategic workforce investments on employer outcomes. (Outcomes might include turnover in long-term care, scrap rates and uptime in manufacturing, and on-time delivery in logistics and transportation.) These tools would be another way to encourage sector partnerships to tackle higher-order organizational improvement issues with a potential to increase the return on investment.

Comments: Employers may find these requirements to be invasive and may therefore stop participating. The goal is to help employers engage. If this strategy is pursued, we ask that the commonwealth give strong consideration to employer needs and perspectives.

Response: We appreciate the comment and note that application for these funds would be voluntary.

- There are many components of the state plan that we see as extremely positive to support our work and while we may not be able to list all of those areas here, we would like to especially thank the Commonwealth for consideration of the following strategies and encourage their

implementation, in addition to the acknowledgments mentioned earlier (ordered chronologically).

Response: We appreciate the support.

- State Plan: (p. 12) The commonwealth will seek to obtain grants to assist in serving individuals entitled to priority of service and will additionally make discretionary state funds available to support the serving of these target populations.

Comments: We commend this goal as a critically important one to pursue. If achieved this would be an integral way for the workforce system to gain more flexibility in service delivery to priority of service individuals and other target populations.

Response: We appreciate the comment in support of this effort.

- State Plan: (p. 13) Recognizing the new priority on OSY, the commonwealth will identify models and effective practices, including for recruitment, flexible enrollment (e.g. self-attestation, co-enrollment, career pathways and retention) to help local area staff successfully meet the needs of those individuals.

Comments: We understand the importance of balancing flexibility with accountability and want to recognize that self-attestation is an important and necessary option to reduce operational resources and time. We value the ability to offer it to many of our clients who realistically do not have easy or any access to required documentation.

Response: We appreciate the comment in support of this policy.

- State Plan: (p. 14) The commonwealth will work with the U.S. Departments of Labor and Education, and also with local boards, to ensure that statistical models and negotiated performance levels are established and calibrated so that they accurately reflect the profiles of out-of-school youth being served within the commonwealth and in each local area.

Comments: This position will allow all parties to have a more accurate depiction of workforce activities and population groups within each area, allowing us to identify the unique needs of each area and region. In order for this goal to be fully achieved, the statistical model should be sufficiently validated.

Response: We appreciate the comment in support of this effort.

- State Plan: (p. 14) In recognition of the focus of federal funds on OSY, the commonwealth will leverage state resources to increase summer employment opportunities for in-school youth. . . The expansion is aligned with President Barack Obama's My Brother's Keeper initiative and Philadelphia's My Brother's Keeper Challenge.

Comments: We appreciate the Commonwealth's commitment to additional funding support for youth summer employment and other programming beyond that provided through WIOA. We look forward to continued partnership with the state regarding opportunities for flexible funding for in-school youth through strategies such as those mentioned on p. 87.

Response: We appreciate the comment in support of this effort.

- State Plan: (p. 46) Trained and informed staff is another critical element to providing comprehensive, high-quality service. An expanded curriculum of standardized courses, technical courses, conferences and workshops enhance knowledge, skills and the professional development of workforce professionals in PA CareerLink® centers, LWDBs and partnering agencies and promote a collaborative and consistent service delivery through information exchange and learning.

Comments: We agree – trained and informed staff is critical to high-quality service delivery. This strategy would be more effective if the state offered more on the level of implementation (i.e., 2 trainings available to all local areas per year). Further, in addition to training, there need to be protocols that guide people in changing their practice going forward after initial trainings, and follow-up coaching, which is very different from monitoring.

Response: We appreciate the comment and suggestions, which we will take into consideration in determining future staff training.

- State Plan: (p. 54) Additionally, a number of LWDBs are considering the use of Executive Pulse to aid in coordinating business engagement between workforce and economic development partners on the regional and state level; the commonwealth encourages this coordination.

Comments: We appreciate the coordination that the commonwealth encourages as it will also be helpful to access this CRM at a reduced licensing cost.

Response: We appreciate the comment in support of coordination.

- State Plan: (p. 81) In cases of individuals with significant barriers to employment, the commonwealth will support OJT, customized training and transitional jobs in quality entry-level positions that provide the work experience necessary to lead to employment in HPOs.

Comments: This is critical if work experience is to provide the resource for those who are further from entry-level employment in a career pathway.

Response: We appreciate the comment in support of this policy.

- Conclusion: In sum, we believe the state plan offers much opportunity for the Commonwealth to achieve at unprecedented levels and respectfully offer our comments in support of that goal. We appreciate the vision of the commonwealth as stated in this plan and are excited about the level of interagency coordination that is taking place to ensure that we are at the forefront of workforce development as it exists across the country. We look forward to continued collaboration with new and existing partners at all levels of government and across titles as we move deeper into WIOA implementation.

Response: We appreciate the comment and too look forward to continued collaboration.

Cheryl Johnson of **PICCC** commented: There are many good things in the State Plan that we are looking forward to working with everyone to implement. There is one area of the plan that I would like to speak to today that could have unintended consequences – that being the mandated percentages of WIOA dollars set aside for training. We share the desire to increase credentials among people in our communities and State. In the Southern Alleghenies region our Board and One Stop Operator are already using flexible and Innovative approaches to meet significant training needs - such that we have no one on the waiting list for training that cannot be funded and almost always have training monies that have been set aside remaining at the end of the fiscal year. Our approach is to use WIA/WIOA funds to provide for the full array of services allowed in the law which can only be offered and funded thru WIOA. A portion of WIOA funds are set aside for training but the majority of our training needs are met through funding sources that cannot be used for staff/operations but can be used for training. Our training needs have been met through TRADE, NEG, Rapid Response, and JOBS first, etc. in a very effective way and other services desired by employers and job seekers can be met through WIOA. When comparing the High Priority Occupations List covering occupations allowable for investing training dollars in, we find many high priority occupations in our area require a bachelor's degree or above. In contrast, the hardest to serve populations coming into our CareerLinks for services – have little to no readiness for post-secondary education. This creates a huge gap that must be filled with other services even to get individuals prepared to successfully take entrance exams much less to succeed in training. Many individuals we work with have low literacy, lack computer skills, have poor work histories, low prior academic achievement and many other barriers. Funds that are taken away and placed in a training line item will not be available to meet these many needs. We have no other sources to meet these needs but we do have other sources we could use for training. There are many other reasons why we believe there are negative consequences to a mandated percentage of WIOA funds set aside for training, which others are addressing in their remarks so I will end my remarks here.

In closing, we respectfully request that this requirement be removed from the state plan and that Local workforce areas be given the opportunity to use flexibility and innovative strategies which allow our regions to be responsive to each ones unique needs instead of a one size fits all approach that we believe will be detrimental to our employers, job seekers and communities.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

Helene K. Nawrocki of the **Potter County Education Council** offered multiple comments to include:

- Recommended insertion into the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan: Page 39-44 Alignment with Other Partner Programs
 - The Community Education Councils network (CECs) as designated by PDE will align training development efforts with the overarching strategies of the Commonwealth to increase the education and training delivery to residents of rural communities.
- Recommended insertion into the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan: Page 51-53 Leveraging Resources to Increase Educational Access
 - The Community Education Council network (CECs) as designated by PDE have historically leveraged other state and local funding to implement sector based training provided through a variety of educational institutions in rural communities where campus locations are non-existent. CECs serve as an intermediary and broker of training programs based on identified need and demand.

- Recommended insertion into the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan: Page 53 under the heading Improving Access to Postsecondary Credentials
 - The Community Education Council network (CECs) as designated by PDE will extend program development activities with postsecondary institutions to ensure that residents of rural communities have access to credential bearing training opportunities.

Response: We agree that the Community Education Councils are important partners and have included them in the final State Plan on page 40, 51 and 53.

Rachel West of **Poverty to Prosperity Center for American Progress** offered multiple comments to include:

- The Center for American Progress (CAP) strongly supports the comments submitted by Community Legal Services (CLS) and the Community Justice Project (CJP) regarding Governor Wolf's Proposed Workforce Innovation and Opportunity Act State Plan (published for public comment on December 28, 2015). CLS and CJP's comments emphasize the importance of using the full amount of funding designated for transitional jobs (also called subsidized employment). Based on our research and expertise in this area, the Center for American Progress is pleased to join CLS and CJP in strongly urging that Governor Wolf use the full amount of designated funding to create transitional jobs for Pennsylvania's disadvantaged workers.

Response: We appreciate the comment in support of the Plan. In view of the expansion of LWDB financial support and inter-organizational coordination responsibilities mandated by the plan, we believe that the plan's requirement that LWDBs and PA CareerLink® centers spend between 5 and 10 percent of their funds on transitional jobs is appropriate.

- Transitional Employment under Pennsylvania's Proposed WIOA State Plan: The Workforce Innovation and Opportunity Act (WIOA) allows states to spend up to 10 percent of Title I funds on transitional employment opportunities for participants. Under Pennsylvania's Proposed WIOA State Plan, local workforce development boards and CareerLinks would be required to use between 5 percent and 10 percent of their funds to provide transitional jobs, especially to individuals who qualify for priority of service. (See the Proposed WIOA State Plan, p. 70.) CAP strongly supports the comments submitted by CLS and CJP on this provision, urging Governor Wolf to use the full amount of funding designated for transitional jobs.

Response: We appreciate the comment and note that the state requirement enhances the WIOA allowed use.

- The Need for Transitional Jobs among Pennsylvania's Disadvantaged Workers: More than six years after the end of the Great Recession, certain groups of Pennsylvania's workers continue to experience elevated levels of unemployment and labor market detachment. Many are individuals who face severe labor-market disadvantages or barriers to employment, among whom high rates of joblessness will remain a persistent problem even in healthy economies. These include individuals who qualify for priority of service under Pennsylvania's plan: individuals with criminal records, out-of-school youth, and recipients of income supports. Because they will continue to be excluded from the labor market without further assistance, these individuals are currently denied the economic security and opportunity that comes with a job. CAP has studied barriers to employment among each of these populations in its recent

work, and has determined that targeted policy action such as a transitional jobs program is required to help these disadvantaged and detached groups regain and sustain employment.

Individuals with criminal records: One in three American adults have some type of criminal record. This translates into nearly 3 million of Pennsylvania's citizens. Individuals with even minor criminal records can face a host of legal, social, and economic obstacles to employment, including widespread employer use of background checks and laws that systematically bar individuals from many licensed occupations. As discussed in detail in our *One Strike and You're Out* report, 3 in 5 formerly incarcerated men remain unemployed one year after their release, and the typical formerly incarcerated man will have lost nearly \$180,000 in lifetime earnings relative to a never-incarcerated man by the time he is 48. Moreover, recent CAP research estimates that nearly half of American children under 18—including more than 1.2 million Pennsylvanian children—have at least one parent with a criminal record. Children of parents with records face a far greater risk of poverty and hardship; enabling these parents to provide for their children through job opportunities should be a top priority, particularly in a state where nearly 1 in 5 children live in poverty. Targeted policies that help returning citizens get a foot in the door of the labor market are critically needed to ensure that a criminal record is not a life sentence to poverty for justice-involved individuals and their families—and to enable Pennsylvanians with records are able to successfully reintegrate into their communities.

Opportunity youth: Youth face elevated levels of unemployment: In 2014, the unemployment rate among those ages 16 to 24 was twice the national average, and was even higher among minority youth. What is more, many of these youth came of age and entered their working years during the Great Recession when jobs were scarce—particularly for those with little or no work experience and minimal education. Research shows that cohorts who graduate in a recession face permanently depressed employment opportunities and earnings trajectories. Targeted policy action is needed to ensure that these individuals are not consigned to a life of poverty by a lack of job opportunity and experience throughout their critical initial years in the workforce.

Individuals with disabilities: CAP's work has documented the large hurdles that individuals with disabilities, in particular, face in accessing employment opportunities. Working-age individuals with disabilities face poverty rates nearly three times higher than those without disabilities—in large part because they are more than twice as likely to be unemployed.

Recipients of income assistance: Over the past two decades, eligibility for public-assistance programs has become increasingly tied to employment. For most American adults, the best pathway out of poverty is still a well-paying job. However, the increased contingencies placed on public assistance have not been accompanied by increased resources for job search—much less a job guarantee for all those who are able and want to work. Thus, this trend leaves those who have barriers to employment with very limited access to resources to make ends meet, or to facilitate successful job search. This lack of resources can compound the very barriers individuals face, leading to a downward spiral of poverty and hardship.

As policymakers make social assistance increasingly contingent on work, assistance in accessing job opportunities will literally provide the only means of survival for low-income and vulnerable individuals who find themselves shut out of the labor market.

Response: We agree that individuals with criminal records, opportunity youth, individuals with disabilities and recipients of income supports are often well-suited for transitional employment opportunities.

- **Transitional Jobs: A Solution for Pennsylvania’s Low-Income Workers, Local Businesses, and the Commonwealth’s Economy:** In a 2015 report, *A Subsidized Jobs Program for the 21st Century*, CAP surveyed the literature on subsidized and transitional employment programs in the United States. The report found that recent subsidized jobs programs have had positive impacts on participants, including increased income, improved employment outcomes, and reduced recidivism. The report strongly recommended the creation of state-level subsidized employment programs—modeled after states’ successful experience using Temporary Assistance for Needy Families (TANF) Emergency Fund dollars during 2009 and 2010 —and urged that states be given the flexibility to determine how best to serve their target populations.

CAP specifically highlighted Pennsylvania’s Way to Work Program as an exemplary state initiative during this period (see page 9 of the report). The program—which drew praise from participants and local business owners alike—suggests that Pennsylvania’s Department of Labor and Industry and its Department of Human Services already have the institutional knowledge required to operate a highly successful transitional jobs program in Pennsylvania.

A state-wide transitional jobs program presents a strong policy option for helping disadvantaged workers get a foot in the door of the labor market. For the populations of struggling workers that Pennsylvania is targeting, transitional jobs can alleviate hardship in the short term by providing immediate work-based income, while also providing valuable work experience that will improve their employment credentials.

In addition to benefitting low-income workers and their families, a transitional jobs program would also help buffer Pennsylvania’s economy against future recessions, softening the impact of future downturns by counteracting increases in unemployment, enabling businesses to preserve and expand their workforces, and boosting economic demand in local communities, and supplementing Pennsylvania’s Unemployment Insurance (UI) and food stamps (SNAP) programs as an automatic stabilizer. Only twice since 1860 has the U.S. gone more than 8 years without a recession. So while the timing of the next recession is uncertain, today—almost 7 years after the Great Recession—is the time to put in place countercyclical programs like transitional jobs that will allow Pennsylvania’s leaders to hit the ground running when the next downturn arrives.

Response: We appreciate the comment in support of our approach.

- **Conclusion:** For Pennsylvania’s disadvantaged and low-income workers, transitional jobs offer a solution to poverty in the near term, and a gateway to improved employment prospects, higher income, and greater economic security in the long-term. But transitional jobs also represent a win-win-win opportunity for the Commonwealth, benefitting Pennsylvania’s employers and its economy in addition to its struggling workers. CAP commends the Wolf Administration for proposing that local workforce development boards and CareerLinks use 5 percent to 10 percent of their funds for transitional jobs—and echoes CLS and CJP in urging the Administration to use the full amount of designated funding for this critically important initiative.

Response: We appreciate the comment in support of the requirement.

Joseph Snyder of **Process and Data Automation** commented: I am confident that my peers have inundated you with form letters covering various legitimate concerns. I want to use this opportunity to focus on one key element of your plan: Goal 4: Engage Employers to Strengthen the Connection of Education and Training and the Economy, Increase Investment in Critical Skills and Increase Jobs that Pay....It is also critical that the commonwealth support employers who want to come together to address their training and human resource challenges in a more efficient, multi-employer way. The fragmentation of employers when it comes to workforce issues - recruitment, training, curricula, credentialing, career pathways - makes it more difficult for workforce services to align their programs with the common needs of employers. Pennsylvania is already ahead of other states in strengthening the voice of groups of employers in workforce development through its national leadership in building Industry Partnerships as well as its extensive investment in multi-employer apprenticeships. The commonwealth will build on its past experiences in order to improve employer engagement with the workforce system.

The commonwealth will measure employer engagement through the yet to be defined federal measure and will also consider additional state specific measures, such as market penetration (the number of employers actively using the public workforce system) or the number and total employment of employers engaged with active Industry Partnerships, apprenticeship programs, or other multi-employer workforce partnerships.

4.1 The commonwealth will critically consider job quality in engaging employers and will require LWDBs to prioritize funds to be used for business services activities, on-the-job training and incumbent worker training to those employers offering high quality jobs. The commonwealth will seek to include model criteria for considering job quality in the standardized On-the-Job Training (OJT) contract described in paragraph 4.9 below. The commonwealth will also use these criteria to target Industry Partnerships and similar state-funded workforce partnerships to employers that offer high-quality jobs or jobs that are likely to lead to high-quality jobs.

4.2 The commonwealth will seek to identify sustainable public and private funding, in addition to the annual state appropriation, for high-quality industry-driven sectoral workforce intermediaries, including Industry Partnerships and apprenticeship programs, to lock in on a permanent basis a strong connection between education and training programs and the demand side of the labor market.

4.3 The commonwealth will implement a program of capacity building, peer learning, and evaluation to support Industry Partnerships, apprenticeship programs, and other multi-employer workforce intermediaries in delivering greater value to employers; job seekers; incumbent workers and new hires, including young people and rehired dislocated workers; adults and youth participating in work-based learning at the companies and/or hired by the companies; and to their industry and regional economies. The commonwealth will consider establishing a formal certification program for Industry Partnerships.

The actions of the State in FY 2016 are 100% counter to the items listed in your goal #4 and as illustrated above. This eloquently written plan for the coming years sounds great but it does not take into consideration the multiple “backwards steps” that our successful IP will take this year due to inaction in Harrisburg. Effectively de-funding our Industry partnership for an entire year will have an immediate impact on employers’ abilities to sustain training initiatives within the current year while breaking continuity with ongoing programs. The long term impact of this year’s (in)action goes much further in

that we will have a more difficult time bringing employers to the table to support future initiatives. Our IP has been successful in bringing a large number of new employers together regularly and your future measurements will show apathy and disbelief in the system after these efforts are rewarded with zero funding for this year.

IP members are all volunteers who have regular responsibilities within their native organizations. Their bosses demand return for the time investment put into the IP and the disappointing answer going back to dozens of executives in NWPA this year is “no funding.....politics as usual”.

Response: We appreciate your support of our approach to employer engagement, to which multi-employer partnerships are key. We share your frustration regarding FY 2016 Industry Partnership funding. We note that the Governor proposed a \$10 million increase in IP funding and is fully committed to the success of the program. The state plan requires LWDBs to support IPs. We will also seek additional sources of non-state (federal and foundation) funding for IPs.

Julie Forster of **Public Interest Law Center** offered multiple comments to include:

- This letter is sent on behalf of the Public Interest Law Center in formal response to the Pennsylvania's notice of request for comments on the Combined Pennsylvania Workforce Development Plan to implement the Workforce Innovation and Opportunity Act (WIOA). We appreciate the opportunity to comment on the proposed Plan. The Public Interest Law Center has advocated for many years to assist Pennsylvanians with disabilities to live and work in the community. At the outset, we would like to applaud Pennsylvania for Goal 2.10 to adopt an Employment First policy in Pennsylvania. Page 39 identifies an Employment First policy in Pennsylvania. Adopting and implementing an Employment First policy is necessary to build Pennsylvania's workforce and provide people with disabilities meaningful access to the workplace. The Plan mentions collaboration among PDE, DHS and L&I to develop and implement Employment First. Such collaboration is crucial to successful implementation, and should be detailed more fully.

Response: We appreciate the comment in support of an Employment First policy and note that the plan states that "Employment First" will be the policy of all executive branch agencies under the jurisdiction of the Governor in serving persons with disabilities. Additionally, PDE, OVR and DHS will take important first steps to collaborate to develop a training strategy to help school district IEP teams learn Employment First principles.

- As a global comment, the Pennsylvania Department of Education (PDE) and Local Education Agencies (LEAs) play a crucial role in WIOA implementation. Unfortunately, the proposed Plan only imposes obligations on PDE for adult basic education and seeks mere cooperation to serve youth with disabilities in transitioning from school to employment. PDE must take a more active role, and the Plan should impose clear requirements for LEAs to effectively support students with disabilities in transitioning from school to work.

Response: PDE recognizes that LEAs have substantial obligations serving youth with disabilities especially related to transition from school to employment. PDE is pleased to work with OVR/DHS on developing a training strategy for school based IEP teams related to secondary and postsecondary work and educational opportunities.

- More specifically, at page 143, OVR takes responsibility for career education and counseling, but the Plan does not require PDE or LEAs to reach out to OVR for services. The most efficient way to disseminate OVR resources is to train IEP coordinators of each school. LEAs already have contact with the students and families who OVR seeks to serve through the 15% reserve for transition-age youth. PDE must commit to training all IEP coordinators in every school district on the need for paid work experiences for all students, including those with disabilities, and the services available through OVR for students who need support with that career planning. Most importantly, PDE must ensure that every student has a transition plan and that every plan includes the opportunity to explore employment.

Response: PDE will continue to collaborate with OVR/DHS by informing OVR of IEP meetings and inviting their participation in planning for students with disabilities and will collaborate with OVR to develop a training strategy for school based IEP teams related to secondary and postsecondary work, including integrated employment and educational opportunities.

- Under the Individuals with Disabilities Education Act (IDEA), all students should have a transition plan in their IEP. We know that many high school students have IEPs that entirely fail to address transition. We urge PDE implement more oversight to ensure all students have a completed transition plan beginning at age 14 so that they can work toward the goals in their IEP. This combined state Plan must clearly delineate how PDE will coordinate with OVR to help OVR identify and connect with students who need services.

Response: PDE will continue to collaborate with OVR/DHS by informing OVR of IEP meetings and inviting their participation in planning for students with disabilities and will collaborate with OVR to develop a training strategy for school based IEP teams related to secondary and postsecondary work, including integrated employment and educational opportunities.

- Pennsylvania should require each student's IEP to document a discussion of employment experiences, opportunities and services needed. We know that having a paid work experience before graduating high school is a strong indicator of success in employment after graduation. Some students with disabilities may not need assistance to obtain after school, weekend, or summer work opportunities. Other students may need employment services. Many never get the opportunity because it is not presented as an option. This must be the responsibility of the LEAs. OVR cannot know each student's needs, but the LEAs are already tasked with that responsibility. Including a complete plan for transition services and employment in the IEP process is essential to connecting eligible students with OVR services.

Response: We appreciate the comment and acknowledge the need for continued collaboration and partnership between OVR and LEAs in supporting students with disabilities to have paid work based learning experiences before graduating from high school.

- OVR is tasked with preparing students with social skills and independence so they can be workplace ready. These are the core functions the IDEA assigns to schools. While OVR certainly should have a role in supporting workplace readiness, it is the LEAs responsibility to ensure all students are prepared with social skills and sufficient independence to enter a workplace. Sadly, we hear from employment services providers that some transition age youth are not prepared to even enter a public place, let alone work in one. LEAs must equip students with disabilities with the skills and experiences to set them up for success as adults in integrated community

settings. OVR cannot be the only agency in this Plan that is responsible for ensuring students graduate school with social skills and independence.

Response: We appreciate the comment and acknowledge the need for continued collaboration and partnership between OVR and LEAs in supporting students with disabilities to have paid work based learning experiences before graduating from high school. PDE understands the responsibilities assigned to schools by IDEA and will continue to provide support to schools in this area.

- The Plan states that no educational agency may enter into an arrangement with a subminimum wage employment program, but does not require PDE to enforce this provision. PDE is the only agency that can ensure no school in Pennsylvania sends students to sheltered workshops. This is a central requirement of WIOA's Section 511. Nationally, fewer than 5% of people in sheltered workshops ever leave for competitive integrated employment. WIOA seeks to ensure students first get the opportunity for paid work in the community. Without a strong enforcement Plan, students with disabilities may continue to be excluded from the workforce, condemned to laboring in segregated workshops for less than minimum wage.

Response: We appreciate the comment. PDE and OVR continue to explore and develop innovative services and supports for individuals with disabilities while we await final regulations, guidance, and technical assistance on Section 511 Limitations on Use of Subminimum Wage. The provisions in section 511 are effective two years after WIOA enactment, specifically, July 22, 2016. Section 511 demonstrates the intent that individuals with disabilities, especially youth with disabilities, must be afforded a full opportunity to prepare for, obtain, maintain, advance in, or reenter competitive integrated employment.

- Page 41 identifies an opportunity to connect services by integrating the PA-WDQI database with DHS, L&I and PDE. Page 65 similarly mentions that eData v2 will connect with CWDS to collect participant data. However, the Plan does not address how Pennsylvania will streamline intake and delivery of services. This is an opportunity to ensure that all students who need preemployment services are identified and can access them. In addition, a combined database can enable individuals to seamlessly transition from PDE to OVR to ODP, as needed. The Plan should require PDE to document all students who require preemployment services in this data system to automate referrals to OVR. This documentation and shared data system will also enable PDE to review which schools are successfully supporting students with disabilities to access employment opportunities and services, and which schools are simply checking a box on the form. Through a shared data system, OVR can expand Early Reach services to schools that have low referral rates and employment outcomes to ensure all students get transition and employment planning through the IEP process.

Response: We appreciate the comment and will take it into consideration when discussing future expansions/enhancements of PA-WDQI and other state data collection systems. We note that eData v2 is specific to adult basic education data and does not include K-12 student data.

- The Early Reach program is currently inadequate. OVR contacts high school students through presentations and may give students written materials. OVR must engage and train all school IEP coordinators on transition and employment services. This Plan is the place to articulate requirements to ensure this happens. A 14-year-old student cannot drive herself to OVR for

employment services. Parents and educators are integral to supporting students who need OVR services to access paid work experiences and transition planning while still in school. The Early Reach program must begin by training educators engaged in the IEP process, and PDE must commit to mandating all IEP coordinators attend training. In addition, Early Reach should use LEA directories to send information on OVR services directly to the homes of students with IEPs in their native language, so that their families are made aware of the services available. The Plan does not mention any efforts to ensure students with IEPs receive written information directly from OVR, much less in accessible language formats. Early Reach is an important program as OVR coordinators cannot be in every school. Happily, there are already IEP professionals in every school. OVR must build on this capacity to connect with all students who may be eligible for VR services.

Response: We appreciate the comment. OVR developed the Early Reach Program that puts Early Reach Coordinators out in schools and at community events talking about OVR services and how we can assist with transition. Because of its success, several OVR offices have elected to expand the Early Reach initiative and have hired additional "Early Reach Coordinators". Additionally, PDE would be pleased to work with DHS on developing a training strategy for school based IEP teams related to secondary and postsecondary work, including integrated employment and educational opportunities including but not limited to the Early Reach program.

- Job services should integrate OVR job seekers and all Pennsylvania job seekers to avoid singling out individuals with disabilities.

Response: We appreciate the comment, which appears to be in reference to the OVR Single Point of Contact (SPOC) model. We note that the SPOC model is to assist employers specifically interested in hiring individuals with disabilities. Individuals with disabilities will not be singled out and will be referred to all employers seeking talent.

- Coordination with OVR and PDE to support people entering postsecondary education must also support transition-age youth who do not seek further academic work to transition to employment.

Response: PDE will continue to collaborate with OVR/DHS by informing OVR of IEP meetings and inviting their participation in planning for students with disabilities.

- Why is OVR alone assigned to analyze the labor market demand for industry recognized certificates? This should be a unified effort among all partner agencies.

Response: OVR is not solely responsible for this task. This item was simply meant as an example to demonstrate how the commonwealth will promote and increase attainment of postsecondary credentials.

- On page 53 the Plan states that: "Education programs, including secondary and postsecondary Perkins and adult basic education, will provide professional development opportunities to help providers understand and navigate the full credentialing spectrum and develop expertise in occupational counseling." Does this mean Pennsylvania will provide education to private providers on occupational counseling? Why would Pennsylvania spend taxpayer dollars on

employment services from any provider that does not already have an expertise in occupational counseling? Why would providers require adult basic education?

Response: Professional development will be provided to staff working in educational programs, such as secondary and postsecondary Perkins and adult basic education, to help them gain skills in providing occupational counseling to students in their educational programs.

- L&I's assessment of CareerLink for ADA accessibility is essential to both serving Pennsylvanians in the workforce, and complying with federal law. Unfortunately, we have received reports that not all CareerLink centers are accessible to individuals with hearing impairments and visual impairments. It is important for L&I to continue regular assessment, but it must conduct a comprehensive review and follow up to ensure proper remediation. All state agencies, providers, and community colleges must meet these standards. Website and software accessibility is of particular concern for Pennsylvanians with visual impairments. Often website and software developers agree to provide accessible technology, but fail to adequately test or ensure that it is in fact ADA compliant. The rigorous review process L&I conducts to ensure accessibility of CareerLink should be applied to all government services. All contracts for software development must mandate full ADA compliance upon condition of payment and ongoing remediation and support of accessibility features. In addition, L&I must ensure its own services are accessible, including job applications to BBVS. This is a particular concern at colleges, which have independent websites and many ADA compliance issues. At page 49, the Plan discusses partnerships with public and private colleges and universities. These programs must be accessible to all Pennsylvanians to effectively implement WIOA. The L&I review process should be expanded to ensure that all institutions of higher education have fully accessible websites, education software, and course materials. Schools must be required to train all instructors on how to create accessible PDFs, web content, and provide reasonable accommodations for coursework, exams, and in the classroom.

Response: Workforce and VR have been collaborating with plans to increase accessibility and usability of not only the physical structures where PA CareerLink® centers are housed but also in regards to the services provided. This collaboration also includes L&I's Office of Equal Opportunity. This renewed emphasis goes beyond basic compliance by assisting local boards, the entities responsible for PA CareerLink® center location and leasing, with technical assistance when selecting sites, evaluating promising or negative features, options for assistive technologies and space planning. There is a likelihood that many boards will want to accommodate greater alignment of programs and consider new space options as partnership under the new law has expanded. It is our hope that this approach will help local boards meet a variety of accessibility needs.

- The Plan at times refers to incorporating OVR with CareerLink One-Stop centers, and at other times refers to a separate OVR Single Point of Contact. Anecdotally, people with disabilities seeking services from CareerLink are referred to OVR because CareerLink does not have accessible computer software or support services for people with disabilities. Integrating the One Stop centers with OVR services and job recruitment is important so that people with the rest of the workforce in Pennsylvania's combined Plan.

Response: We appreciate the comment and note our intentions to train and equip PA CareerLink® staff in an ongoing learning process with the knowledge, skills, and motivation to provide superior service to job seekers, including those with disabilities.

- We request clarification that the training programs at community colleges, career and technical schools and other Perkins recipients occur in integrated settings. A training program exclusively for people with disabilities may place people at unnecessary risk of segregation, even within an otherwise integrated college campus. We also seek assurances from the state that such training programs will not replicate sheltered workshops, will not offer subminimum wage compensation, and will be time limited. It appears that is the intent from the Plan, but program providers must be clear on OVR's expectation to provide integrated training services.

Response: We appreciate the comment. OVR has established an amendment to its college policy that provides funding for its programs that have been approved by the federal department of education has a comprehensive transition program (CTP). In order to reach this designation schools must ensure that their programs are being implemented in most integrated setting possible. OVR has not approved funding for programs similar to comprehensive transition programs due to the fact that they have not reached the same level of integration nor have they been approved by the federal department of education as a CTP.

- OVR commits to provide career counseling to Pennsylvanians currently laboring in subminimum wage. We applaud OVR's commitment, and believe this is the right agency to provide the career counseling mandated by WIOA. However, the Plan does not state how OVR will provide this counseling. Many people laboring in sheltered workshops have been there for decades. They have not had experience with working, have been told they cannot work, or may have had negative experiences working. OVR must take care in addressing their needs. First, OVR should frame working or employment in terms of earning money, rather than getting a "job." Research has shown that people may have a negative reaction to the idea of getting a job or working because they have been told it is something they cannot do or have had a negative past experience with it. Many individuals are receptive to the concept of earning money, and employment counseling should be framed as earning money rather than working or getting a job. Second, OVR must commit to entering each subminimum wage employer in Pennsylvania to provide employment information and counseling. Some people have not accessed employment because their residential provider or family does not want the person to work. Accordingly, it is essential to engage directly with each person who is currently working for less than minimum wage to ensure that he or she has in fact accessed the career services or counseling that he or she needs to understand the opportunities and services available for competitive integrated employment.

Response: We appreciate the comment and await the release of final regulations, guidance, and technical assistance on Section 511 Limitations on Use of Subminimum Wage. Once we have received that information we will be better able to provide the necessary guidance and training to OVR staff.

- OVR is not the only agency with a key role in implementing Section 511. While OVR is responsible for providing employment services, ODP is responsible for approving Medicaid funding that pays for subminimum wage work. Prevocational services are provided in sheltered workshops, which pay less than minimum wage and segregate people with disabilities. WIOA

commits to giving all young adults the opportunity to access the workforce before being shuttled into subminimum wage work. This plan should require ODP to ensure that every young person has had to access employment services before approving subminimum wage work and to document how that has been accomplished.

Response: DHS agrees, which is why in a Medicaid waiver amendment approved by CMS on July 22, 2015, it included a provision that no new prevocational service for anyone under age 24 can be authorized in an Individualized Support Plan unless the person has first gone to OVR and been determined ineligible or their VR case has been closed. We also note that we are awaiting the release of final regulations, guidance, and technical assistance on Section 511 Limitations on Use of Subminimum Wage.

- Finally, we question why all young people should not have the opportunity to work in the community. Why can a young person who has benefitted from the IDEA, which commits to preparing students for economic independence, enter a segregated adult day care facility without ever having accessed employment services? WIOA emphasizes the imperative to provide employment services to people with the most severe disabilities, including young adults with both physical and intellectual disabilities. We urge Pennsylvania to seize the opportunity under WIOA and commit to providing all transition-age youth with disabilities the opportunity to access career counseling and employment services before approving public funds for adult day services. Indeed, this step is necessary to implement Pennsylvania's Employment First Policy where "employment is the first consideration and preferred outcome for publicly funded services." Through customized employment, people with significant disabilities can bolster our workforce and provide important services to our businesses. This is the promise of WIOA.

Response: We appreciate the comment and note that under WIOA a young person will not be referred to a sheltered workshop without having the opportunity to access career counseling and employment services first.

Dr. Anna Weitz of **Reading Area Community College** offered multiple comments to include:

- On behalf of Reading Area Community College (RACC) I am pleased to offer comments on Governor Wolf's Workforce Innovation and Opportunity Act (WIOA) Combined State Plan proposed to be effective July 1, 2016.

As a publicly supported, comprehensive community college located in the City of Reading but serving all of Berks County, RACC has a keen stake in workforce issues. This includes the proposed state plan that as now outlined intends to include a number of key programs and initiatives which have a major impact on those we serve and that previously have been administered differently. I also want to point out that RACC is the Commonwealth's only higher education institution to meet the federal threshold of being a Hispanic Serving Institution (HSI), one located in the heart of a severely economically distressed urban area. That means our programs and services run the gamut from basic literacy and English as a Second Language instruction to degree options leading to workforce credentials as well as transferability to Bachelor degree partners. RACC also has a specialty focus on high end employer-centered advanced technology and manufacturing training offering nationally recognized programs in these areas.

Response: We appreciate the comments and value RACC as a key partner in the workforce development system.

- Recommend that the Commonwealth Separate the Carl D. Perkins from the State's Combined WIOA Plan. It is unclear what the benefits would be of combining Perkins with the state WIOA plan. Including Perkins within the WIOA plan will impose an additional bureaucratic structure and increase paperwork and reporting requirements while at the same time decreasing the amount of funds available to the training providers. At RACC there is already more demand for Perkins services than the existing appropriation can support, so diverting even a small percentage to new overhead or administrative costs will harm students and clients of the workforce system. In addition, the current structure is effective and efficient. At RACC we have strong employer, community and workforce system professionals' involvement with our College's Perkins plan. They are very supportive of Perkins continuing to be a college-based funding source that provides critical services to eligible students. Community colleges have a strong working relationship with the Pennsylvania Department of Education (PDE) relative to the efficient use of Perkins funds. There is no discernible need to change what is working well. And lastly the Perkins program is currently being considered for reauthorization by the U.S. Congress. Including Perkins in the Commonwealth's WIOA plan may make it more difficult to comply when reauthorization is complete.

Response: PDE agrees that including Perkins as a Program Partner in a WIOA Combined Plan could result in additional requirements for Perkins recipients especially without additional guidance from USDOL and USDE. PDE will be revising the Perkins Local Plan to include additional requirements of the Perkins recipients. As noted, the Perkins recipients will have to document and assure compliance. Reauthorization of the Perkins Act has not yet occurred and continues to be the subject of political negotiation. PDE also notes that community colleges have working relationship with WDBs in addition to PDE. It is noted that submission of a state plan is a federal requirement; therefore the commonwealth cannot postpone implementation until a time when federal reauthorization of the Perkins Act is completed.

- Recommend that the Commonwealth Separate the KEYS Program from the State's Combined WIOA Plan. RACC has enjoyed success in working with the KEYS target population and has established a strong working relationship with our County's Social Services agencies for referrals and provision of wraparound services that these students often desperately need. As stated above this program is effective with some of our areas' most hard to serve individuals. We have gained approval for training program flexibility that could well be lost if KEYS is rolled into the Commonwealth's WIOA. Our goal is to help those served gain employment in jobs that provide family sustaining wages. Our close ties with employers needing workers in these targeted training programs cannot be duplicated by a more general workforce system that does not have the close working relationships established over time by RACC staff. We know and understand the multiple needs and challenges faced by these students, and our own KEYS staff, well trained and experienced in serving this population, provide the focused and sustained campus attention that cannot be provided elsewhere. To lose any funding or flexibility in supporting the KEYS population will only hinder the program's positive impact and potentially lessen the number of workforce successes.

Response: The inclusion of KEYS in the WIOA Combined State plan will not alter the current fiscal or programmatic policies and procedures of the KEYS program.

- Recommend the Commonwealth Leverage the Experience and Expertise of the Community Colleges Rather than Concentrating Funds In and Requiring Decision-Making to Be Run Through the Workforce Investment Boards (WIBS) and CareerLinks. Community colleges have significant experience in serving the targeted populations and experience working with community partners to provide wrap around services. The Community colleges also have good working relationships with employers in the local community. Our relationships with employers and our on-going communication / interaction with them are reflected in the following: ~ Job placement services for graduates as well as vibrant internships, practicums and clinical experiences for our career programs. ~ Employers' active involvement in / on career program advisory committees. ~ RACC's Board of Trustees and Foundation Board of Directors both represent a cross-section of employers and community leaders who are strong advocates for RACC. ~ A list of over 120 regional employers (from 8 counties) who utilize RACC's Schmidt Training and Technology center for customized programs for incumbent workers, offer internships to students, and are eager to work with its staff on post-program completion student employment. ~ RACC's close working relationships with business and economic development organizations such as the Berks Business Education Coalition, the Greater Reading Economic Partnership, the Berks WIB and the Greater Reading Chamber of Commerce and Industry. RACC is a strong partner in joint workforce initiatives that stress the need for educational attainment and workforce training beyond high school especially in high demand fields.

Response: Community colleges are an important partner in the workforce system. The community colleges do have very good relationships with employers in the local communities that they serve. However, there are large areas of the commonwealth where the community colleges do not have those strong relationships. As such, the commonwealth disagrees that the community colleges can take the place of the LWDBs and PA CareerLink® centers.

- RACC's Technical Academy with our County's Two Career and Technology Centers is a Model Program. Our working relationship with both the Berks Career and Technology Center (BCTC) and The Reading Muhlenberg Career and Technology Center (RMCTC) has drawn great praise from regional employers and workforce professionals. A type of honors secondary school program, the Technical Academy allows CTC students in select tech fields like mechatronics engineering, electronic health care records and IT to earn up to 27 RACC college credits toward an Associate degree while still enrolled in high school. This fast track to degree completion in high demand fields is gaining enrollment as it is an example of a sound educational partnership that is cost effective for students and their families.

Response: The commonwealth applauds RACC and its partners in creating this partnership.

- Recommend that the Commonwealth Use the Governor's Set- Asides for Business Education Partnerships with Community Colleges. RACC's experience and employer relationships make us a natural choice for such funding. We understand the power of coalitions and partnerships, and can build consensus on needed initiatives in an efficient, highly impactful manner. As an example RACC has been a driver of a community campaign designed initially by the Greater Reading Economic Partnership, CAREERSIN2YEARS, that emphasizes the opportunities in advanced manufacturing and related technology fields.

Response: The commonwealth appreciates this comment and will take it into consideration when making final decisions regarding use of the Governor's set aside funds.

- Recommend that the PA-TIP program be expanded to include the addition of CIP 51 to cover more health care occupations. Discussion in draft plan starting on page 53. Health care occupations are significant to the current and future workforce growth and economic viability of the Commonwealth. Expanding the eligible PA-TIP programs to include the health care industries would provide much-needed financial assistance to students seeking to be employed in these critical occupations.

Response: PA-TIP is a program created by the legislature in 2012 to prepare students with the skills in high demand by today's employers. The program, funded and administered by PHEAA, provides awards to students enrolled in specified programs of study. We will reach out to PHEAA regarding this request.

- In conclusion while RACC supports the Commonwealth having a highly collaborative and comprehensive workforce system, the WIOA as proposed has several problems that could, if implemented, decrease flexibility, increase administrative barriers and in the end prove to be less effective than what is now in place. Encouraging cooperation is better than forcing dollars to be allocated through the WIBs /CareerLinks putting them in the role of gatekeeper. I urge the commonwealth to utilize the expertise of its community colleges and not to tie our hands. Our commitment to educational attainment and workforce development tied to our local community needs is unparalleled.

Response: We appreciate the comments. There is value to local flexibility but that flexibility must be exercised in support of the Governor's workforce goals and, therefore, must be subject to some state-imposed rules.

Rosalee Pituch of **Rebecca M. Arthurs Memorial Library** commented: I firmly believe libraries are in a perfect position to play an integral role in serving employers, employees, students, and all learners seeking to enter or re-enter the workforce.

Libraries are open more hours, are located in most communities removing the barrier of transportation, serve all age groups, and provide professionally trained staff to assist anyone using the library who needs help with technology, language skills, literacy, or the myriad of issues that arise around workforce development. This list is not inclusive. There are so many more services that can be provided through libraries to the many youth, job seekers, employers and more who need help.

I am writing from a public library perspective but libraries of all types should be included in any plans made to shape a stronger, more productive workforce which benefits all of us through a stronger Pennsylvania economy.

Budget and resources are always the issues. Libraries naturally offer a higher return on investment. The resources provided in the libraries across the Commonwealth will make all Workforce Development plans better. Please include libraries in these plans.

On a local level this library has partnered many times over the years with Workforce Development.

Response: We appreciate the comments about the library's convenient location and hours, and the services already provided to individual jobseekers and businesses. We made further reference to libraries as system partners on pages 11, 42 and 48 of the final State Plan.

Linda Drummond of the **Rehabilitation and Community Providers Association** offered multiple comments to include:

- This is a thorough state unified plan that follows the federal WIOA law directives and requirements. The plan includes the coordination of cross-systems responsibilities and services to assist individuals with a variety of disabilities to potentially obtain competitive employment; These included the Departments of Education, Human Services, and Labor and Industry, as well as the relevant offices in each department, such as Office of Developmental Programs, Office of Adult Education, Office of Special Education. The inclusion of Customized Employment and Discovery will be an asset to assist the most challenged to prepare for employment with addressing their interests, skills and abilities. It is helpful to see the WIOA required steps that L&I and OVR must take to assure options are available and intense planning is coordinated to assist with employment.

Response: DHS and OVR appreciate this comment and input. Discovery and Customized Employment services will continue to evolve in Pennsylvania. As this is a new service, collaboration and alignment in the various state agencies will be important for the implementation and utilization of such services.

- As RCPA represents many agencies that provide OVR funded services, our concern is that policies need to assure that options exist for those unsuccessful with competitive employment efforts; These individuals need to be provided with other daily options which may include subminimum wage employment in work centers. Other options may need to be developed for these individuals that will address continued development of their skills and abilities for potential future employment, focus on daily activities to promote learning, daily living skills, plus opportunities for community inclusion and interactions with others.

Response: We appreciate the comment. DHS' Medicaid HCBS waivers provide a number of employment and other community-based services for individuals with a disability. All services provided via an HCBS waiver must comply with federal CMS rules in terms of what is considered home and community based versus what is considered segregated and isolating. We note that we are awaiting the release of final regulations, guidance, and technical assistance on Section 511 Limitations on Use of Subminimum Wage. WIOA and the commonwealth's Employment First policy do not preclude alternative options for those who are unsuccessful in competitive integrated employment but do prevent people with disabilities from being placed in alternative settings without receiving counseling about competitive integrated employment opportunities.

- Also, for many that are employed, it may be only part-time employment and this unified plan with cross-systems collaboration needs to address other daily options for the times that are not spent on the job. Again these options need to address further skill development and community inclusive activities.

Response: We appreciate the comment. Nothing in the state plan prohibits placement into part-time employment where appropriate.

- The relevant state departments that are a component of this WIOA Plan need to work with the existing services such as sheltered work centers which are a vital part of the state's manufacturing system providing labor support for businesses and employment for those that have many challenges which impact their ability to obtain or retain community integrated employment. This cooperation will allow the systems to continue needed services, and provide a variety of opportunities for individuals.

Response: We appreciate the comment and support engaging service providers for persons with disabilities and other stakeholders as WIOA implementation continues.

Dennis Wilke of **Rosedale Technical College** offered multiple comments to include:

- In the description of the Perkins State Plan for the CTE Perkins Grant program, I am concerned about the Evaluation and Performance Measurement Indicators. Under the current Perkins plan and in the prior versions, some of the performance indicators for post-secondary institutions have been inaccurate in evaluating performance. This WIOA plan document refers to the Perkins State Plan for details of the performance indicators, but does not describe them in any detail. However, these indicators really must be improved with the next version of the Perkins State Plan and so I thought my comments here would be appropriate. For example, the 2 indicators referring to non-traditional post-secondary student participation and completion use numerical targets that are averages across all CIP codes resulting in dramatically unrealistic performance targets. For example, the participation and completion goals for female electrician students has been approximately 20%. When the BLS statistics show that less than 1.5% of all electricians currently working are female, it is quite unreasonable to expect a school to achieve 20% female students in its population. Since our college teaches primarily programs that are similar in nature to these statistics, it is completely beyond our control to achieve these arbitrary performance indicator goals. Our college non-traditional population is typically a very admirable level of approximately 3 times the normal non-traditional workforce participation rate, but we will never be able to hit the Perkins goals that have been used in the past. That is demoralizing and does not accurately reflect the success we've had in promoting non-traditional careers.

Response: PDE agrees that including Perkins as a Program Partner in a WIOA Combined Plan could result in additional requirements for Perkins recipients especially without additional guidance from USDOL and USDE. PDE will be revising the Perkins Local Plan to include additional requirements of the Perkins recipients. As noted, the Perkins recipients will have to document and assure compliance. Reauthorization of the Perkins Act has not yet occurred and continues to be the subject of political negotiation. PDE also notes that community colleges have working relationship with WDBs in addition to PDE. The federal Perkins regulations mandate the current performance measurement indicators and are not able to be changed until Perkins is reauthorized. Perkins regulation did allow for local negotiations. Rosedale Technical College renegotiated its level of performance during the 2014-15 grant year. The state provides technical assistance and professional development to all Perkins recipients. The focus of the Department assistance is to assist Perkins recipients in meeting low performance. Technical assistance included micro-message workshops. Rosedale is invited to participate in the technical

assistance activities. Rosedale Technical College has not received a sanction letter for not meeting the nontraditional indicators for 3 consecutive years.

- The WOIA describes the Benefit and Service Approval process for the administration of TAA retraining funds. The current process for this program does not fully serve the best interests of the eligible participants. I know of multiple specific instances where an eligible participant was denied the opportunity to attend a training program that they knew would best serve their need to obtain job training. The current rules provide only for the lowest cost program within a certain mile radius to be approved without regard to the participants knowledge of and confidence in the quality of the programs and the best fit for that participant. Why would there not at least be an option for the participant to be awarded the amount of the lowest cost program which could be applied at the institution of the participants choice? In one case, a participant decided not to attend any job training program because he didn't want to attend the approved program that was 48 miles away from his home, while his preferred program was less than 10 miles away. The way these program approval rules are being applied do not adequately serve the participants best interests. Allowing a capped award to be somewhat portable in reflecting the participants preferences would cost the same amount but would result in higher performance. Program completion rates would be higher if the participant had more say in which program they were able to take, subject to Merit Staff review of course.

Response: Training Available at Reasonable Cost. The regulations at 20 CFR 617.22(a)(6) require that training be, among other things, at a reasonable cost. Further, approval requires that the training be at the lowest reasonable cost (20 CFR 617.22(b)). In particular, training at a facility outside the workers normal commuting area, as determined under the state law (20 CFR 617.3(k)) that involves transportation (or subsistence) costs which add substantially to the total costs of training must not be approved if other appropriate training is available at a lower cost within the commuting area. When training, substantially similar in quality, content and results, is offered at more than one training provider, only the lowest cost training may be approved (20 CFR 617.22(a)(6)(iii) (b)). A state must disapprove a training program if the training is in an occupational area which requires an extraordinarily high skill level and for which the total costs of the training are substantially higher than the costs of other training which is suitable for the worker (20 CFR 617.22(b)). Therefore, computation of a transportation payment is an important part of the determination of whether a particular training program is available at a reasonable cost. The 50 mile radius is a Labor & Industry decision based on an appropriate daily commuting distance. In the case where a participant decided not to attend any job training program, we take into consideration many variables and must adhere to the Trade Act of 1974, as amended, with our decisions. A participant has the right to appeal any decision that is made by Trade Act Services. USDOL provides L&I with federal funds in the form of a grant, and L&I executes Trade Master Agreements to disburse such grant monies with institutions for the provision of TAA training and services. Funds are not paid directly to participants.

Heather J. Wakefield of **Saegertown Area Library** commented: I find the ideas of the PA Workforce Development Plan potentially beneficial and applaud these efforts to aid individuals struggling to find jobs that allow a good standard of life. Utilizing libraries could increase the effectiveness of these programs. As the director of a small, rural library, I frequently interact with job seekers who do not have internet access at home and those who need assistance with finding and applying for jobs. Many lack computer, communication, and/or other skills that would make them desirable employees. With limited staff, we find meeting all their needs can be challenging. However, we can identify individuals who could

benefit from additional skills courses, internships, and apprenticeships and help them connect to these services. We could set up a job resources space with information on internships and classes. We could also host classes, especially for those with transportation issues who can walk to our library but would find going to a career or other agency difficult. (We currently have no career or education center in our town, so people must go to the nearest city for these services.) We have had a resume workshop and basic internet classes and will continue to schedule more of both, but we would be thrilled to expand what is available if we have someone willing to offer instruction. We have had a GED class come to the library for lessons on information literacy skills. We also welcome the opportunity to collaborate with local businesses offering apprenticeships and internships by connecting them with job seekers. We have already developed working relationships with many local businesses, so this would be a natural, mutually beneficial expansion of these connections.

Thank you in advance for your consideration of my comments. I know libraries can continue to be a vital resource for job seekers and businesses as we strive to build our economy and communities. I wish you success in implementing these programs.

Response: We appreciate your comments about the plan and the service that the library provides to jobseekers and employers in Pennsylvania's small and rural communities and made further reference to libraries as system partners on pages 11, 42 and 48 of the final State Plan.

Cathi Alloway of **Schlow Centre Region Library** offered multiple comments to include:

- I have a few quick comments on the Consolidated Workforce Development Plan regarding public libraries. I attended meetings last year of a county taskforce looking at workforce development in our area, especially for skilled labor.

I am dismayed that there is no mention of the role public libraries can play in workforce development in PA. We already have public computers and resources for job-seekers, test proctoring, and other resources for students, including non-traditional and skilled trades. Public computing, in particular, is critical. Studies from the Pew Research Center have documented that low-income, low-education citizens tend only to have a smartphone for Internet access. Completing job applications and income tax forms is simply not something that can be completed on a cell phone, as we see daily in the libraries. Our libraries see many, many people daily using resources for career growth and development.

There is an opportunity on page 11, section 2.8, which could be revised as follows:

The commonwealth will continue to foster relationships between the workforce development, post-secondary, secondary education, and public library systems to ensure system alignment, programs of study and services that support job seeker and employment needs, and leveraging of resources.

Response: We appreciate the comments about libraries that offer computer training, meeting spaces for training and the value of statewide purchase of electronic resources for jobseekers and made further reference to libraries as system partners on pages 11, 42 and 48 of the final State Plan.

- PA nonprofits, including libraries, continue to lack funds for staff and can provide wonderful opportunities for work training. My library is fortunate in that we have PHEAA work-study students and an "Experience Works" trainee. We are offering them well-rounded, robust experiences, as they are integral to our daily operations, given our current under-staffed status. Prioritizing placement of students in programs, such as those listed on page 14, section 3.8, in nonprofits and libraries, would be appropriate.

Thanks for the opportunity to provide input. I really do hope that there is some mention of the essential role public libraries play in this process.

Response: We appreciate your comments about the value of work-study and earning work experience through small nonprofits such as libraries. We believe the types of programs you are suggested are covered by the "other partner programs" language in Goal 3.8.

Judith Olmstead of **Scobell Company, Inc.** offered multiple comments to include:

- Training Benchmarks (p. 10: State will establish benchmarks for how much WIOA Title 1 funding must be used for training by local areas) While there is certainly value to up-skilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title 1 funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well job seekers that contribute to the regional economy.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- Priority of Service Benchmarks (p. 68: State will monitor data reported to determine the percentage of those served who are individuals with priority of service and barriers to employment) Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. This will have a significant impact on the local area's ability to meet the critical needs of dislocated workers from Joy Mining, General Electric Transportation Services (GETS), and other employers that are experiencing reductions in the workforce.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams

and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- Transitional Jobs (p. 70: Local Workforce Development Boards will be required to use between 5-10% of Title 1 funds to provide transitional jobs and ensure that priority of service for transitional jobs is afforded to individuals who qualify) NW PA WDB applied and received funding from the Workforce Innovation Fund (WIF) federal grant program to target the population described in this section of the State plan as priority of service. The requirement to spend Title 1 funds for this group will negatively impact the ability of staff to meet the goals of the federal program. Flexibility in the state plan for the local board to determine how or what funds are used to meet the requirements is advised. Additionally, the need to get approval from the commonwealth to transfer funds from Title 1-B funds from Adult to the Dislocated Worker Program will negatively impact our ability to be responsive to the needs of dislocated workers in the area such as GETS and Joy Mining.

Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs. Regarding transfer of Title I funds, the commonwealth will review requests to transfer funds as quickly as possible to ensure service delivery is not disrupted.

- Employer Services (p. 24-25) (p.67) and throughout the plan a definition of High Quality Jobs is necessary to determine the focus of employer services. Recognizing that many of the openings are low end and replacement for turnover and not going deeper into the data is a concern. There are many job seekers that do not have the skills for a higher level position and employers that need to fill these positions in order to vet a new employee that may move up a career pathway/ladder. Also this is cause for concern in prioritizing employers for services that they are begging to have.

The plan, in general, does not cover many employer services. The focus is on the funding which follows the job seeker and is targeted (70%) to those with barriers to employment and prioritizes three areas 1) recipients of public assistance 2) other low income individuals and 3) individuals who are basic skills deficient.

Response: We appreciate the comment and recognize some subjectiveness in the term "high-quality jobs," although the plan outlines characteristics of high quality jobs (reasonable wages, benefits, full-time stable employment, advancement opportunities, etc.) in the introductory language under Goal 4. While the State Plan emphasizes and encourages high-quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high-quality jobs. We also agree with the commenter that the workforce development system can only be successful if it is responsive to the needs of employers. Goal 2 focuses on developing a pipeline of workers to meet industry needs and Goal 4 speaks to engaging employers and being responsive to their needs.

- Data Collection (p. 18 comments 5.1 through 5.7) ROI & Market Penetration (p. 32 table) While we recognize the importance to protecting data, as a local partner the WDB will need to utilize the information to make local decisions that are not necessarily interesting to the commonwealth. The state plan does not clarify what access the local board will have to the

data. In addition the definition for ROI and Market Penetration are not clear. If employers are not eligible because they do not qualify for services due to high turnover or low wages (p. 29) it will be impossible to meet the imposed requirements. We encourage the commonwealth to share the raw data with the local areas so that improvements in the system can be made.

Response: The commonwealth must ensure the integrity and security of data among all partners and programs. As the volume and diversity of workforce data grows, so too do the opportunities and challenges of sharing information among all involved. We are committed to expanding access within the parameters outlined by statutes, regulations, and policies that govern the release of this data. Additional clarity for the ROI and market penetration measures will be provided once final WIOA regulations are released.

- High Priority Occupations (HPO) List and High Turnover Positions (p. 24-25) It is admirable that the commonwealth wants to reduce the high turnover rates and focus on retention, but without a change in the method for developing the HPO list it will be nearly impossible. Given the principle of consumer choice used at the PA CareerLinks® it is unlikely that we will experience a reduction in the number of individuals requesting training that is on the HPO list to focus on positions where the turnover is low.

Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned.

- Workforce Development System-Alignment Strategy (p. 29) This is an area that can be improved in the PA CareerLinks® and I am pleased to see that the commonwealth recognizes the need. Each partner in the PA CareerLinks® should be willing to serve each client that enters and share the information with all professionals employed in the site.

Response: We appreciate the comment in support of this effort.

South Central PA Works offered multiple comments to include:

- South Central Pa Works (The South Central Workforce Development Board) strongly supports the Governor's vision and goals for our public workforce development system as outlined in the Commonwealth's proposed Workforce Innovation and Opportunity Act (WIOA) Combined State Plan. It is our intent to make this vision a reality for the Commonwealth of Pennsylvania.

As a regional workforce development board representing 8 Counties (York, Adams, Franklin, Dauphin, Cumberland, Lebanon, Perry & Juniata) in South Central Pa, we are leading the development of an innovative, employer-driven workforce development system to support the economic growth of our region, using the resources and flexibility found within WIOA and elsewhere to remain nimble and innovative in support of our diverse mix of business and jobseeker customers. With this in mind, we respectfully submit the following comments:

Response: We appreciate the comment in support of the Governor's vision and goals.

- Goal 2 – Invest in Talent & Skills for Targeted Industries in Strategic Partnership with Employers & Education Institutions (pg. 10)

We recommend providing additional clarification on the following with respect to the calculation of the proposed benchmarks for WIOA Title I funding:

- Exclude dislocated workers from the training expenditure calculation, as their eligibility is not based upon barriers.
 - Exclude youth from the training expenditure calculation as well, as all youth must have a legislative barrier (defined under WIOA) to be able to participate in a WIOA funded program.
 - Include all allowable training activities under WIOA Section 134 (WIOA pg. 191) as well as work experience in calculating training expenditures.
 - Include PELL, scholarships and other forms of financial aid available to participants.
 - Include additional one-stop partner program training expenditures for participants who are dually enrolled in another one-stop partner program (Title II, OVR, etc.) and WIOA as defined within the Combined Plan.
 - Include the costs of assessment, case management, registration, books, lab fees, required uniforms and other costs necessary for participants to enroll in and successfully complete our training programs.
- We recommend with respect to the goal of expending 70% of Title I funding on individuals with barriers that additional clarification to this section be considered as described below:
 - Exclude dislocated workers from the calculation, as their eligibility is not based upon barriers.
 - Include our local board definition of not earning a “self-sufficient” wage as one of the barriers

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- WIOA Performance Goals for Core Programs (pg. 31)

While we are still transitioning to WIOA and participants enrolled prior to publication of the final negotiated measures will be included in the determination of the WIOA measures next year, it is respectfully suggested that consideration be given to lowering the targets for the performance measures to the baseline met by the State during its last year of performance under the Workforce Investment Act (WIA). This suggestion is premised upon the following:

- The parameters for the calculation of the measures have not yet been issued by the USDOL and will likely not be issued until after the State plan is due.
- There are 3 new adult/dislocated worker measures, for which, there is no existing baseline established under previous legislation, upon which to estimate performance.
- There are 4 new youth measures, for which, there is no existing baseline established under previous legislation, upon which to estimate performance.
- The method for calculation of all the WIOA measures will not be the same as under previous legislation.

- Data needed by states and local areas to manage performance is a challenge to obtain because it is partially based on the Wage Record, which is 9 months in arrears. As a result, course corrections cannot be made until the year after performance for the previous year has already been determined. We understand that under WIOA the USDOL will be working on ways to improve reporting; however, as we enter into WIOA, we will still be working under the current reporting system.
- The penalty to states for not meeting the WIOA measures can be as much as a reduction of 5% to the State's 15% portion of the grants (WIOA Sec. 116).

We respectfully submit that the Commonwealth set a lower baseline for performance in the plan while still encouraging and incentivizing our area (and others) to meet the Governor's thresholds. In doing we and the Commonwealth can strive toward the Governor's goals without placing undue pressure and risk on the State and Local workforce development system.

Response: WIOA presents many new performance measures and goals. For many, there is little or no baseline information. The targets as expressed in the plan represent a starting point for conversations among providers, partners, and policy-makers.

- Priority of Service for Recipients of Public Assistance, Other Low-Income Individuals, and Individuals Who are Basic Skills Deficient (pg. 67)
We recommend the Commonwealth's plan recognize individuals with barriers may not always have the necessary qualifications, as required by WIOA Section 134 (WIOA pg. 191) to succeed in training without further assistance from another workforce development system partner program (Title II Adult Literacy, OVR, Community Based Social Service Agency, etc.). We see greater success when our CareerLink teams can assess, identify, and refer these individuals to the additional assistance they may require before enrolling in our training program, improving the probability of a successful outcome for our participants.

Similar to our prior comments with regards to the calculation of the proposed WIOA Title I benchmarks, we respectfully request the State to consider the following clarifications with respect to "priority of services":

- Exclude dislocated workers, as their eligibility is not based upon barriers.
- Include those individuals who meet our local board definition of not earning a "self-sufficient" wage as one of the barriers, or that this individual be considered low-income, thereby entitling them to a priority of service.

Response: We appreciate the comment and agree that the 70% requirement should only apply to the WIOA Adult and Youth funding streams and will make that clear in the state plan.

Senator Lisa Baker commented: I am forwarding concerns relayed to me by various involved groups regarding Pennsylvania's WIOA Combined State Plan, 2016-2020. While those I have spoken with support increased accountability among service providers, there is broad-based concern that a mandate requiring 50% of Title I funding be spent on training (and that 70% of those funds be spent on individuals with barriers to employment) unfairly restricts the ability of workforce investment boards to appropriately expend dollars. Instead they are seeking additional options to allow monies to be tailored to local needs. I ask that you seriously consider developing alternative benchmarks that would allow for the flexibility required. Of course, I stand ready to assist in any way possible.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

Kelly Davis of **Seneca Highlands Intermediate Unit 9** commented: How will effectiveness in serving employers be measured among all groups, but particularly adult education providers?

Response: Effectiveness in serving employers is a federally mandated performance measure. Additional guidance on how it will be measured will be provided upon release of the final WIOA regulations by the federal government.

Tony Sarmiento of **Senior Service America, Inc.** offered multiple comments to include:

- Senior Service America, Inc. (SSAI) appreciates this opportunity to submit comments regarding the draft Pennsylvania WIOA Combined State Plan. SSAI currently operates the Senior Community Service Employment Program (SCSEP) in Pennsylvania and 15 other states as one of USDOL's national grantees. For more than 40 years, we have worked closely with our four subgrantees (Tri-County Workforce Investment Board, Greater Erie Community Action Agency, Lawrence County Community Action Partnership and the Armstrong Area Agency on Aging) to help low-income unemployed older Pennsylvanians return to the workforce. Our national network of 80 subgrantees includes workforce development agencies, area agencies on aging, faith-based organizations, and community colleges, as well as community action agencies and other nonprofit organizations. With our network, SSAI is firmly committed to improving the employment, health, and well-being of low-income older Americans by connecting them to resources available under the Workforce Innovation and Opportunities Act, the Older Americans Act, and other programs. In our view, Pennsylvania's draft WIOA Combined State Plan (dated 12/28/15), particularly pages 204-230 related to SCSEP, contains several praiseworthy elements that should assure older Pennsylvanians that the State of Pennsylvania has not forgotten them. Especially noteworthy is the Pennsylvania Department of Aging's partnership with the Pennsylvania Home Care Association to improve the skills of current and future workers as noted on page 48 of the Combined Plan.

Response: We appreciate the comment in support of our planned actions.

- But like many states SSAI currently serves, Pennsylvania faces significant challenges as well as opportunities to serve its older workers under the new WIOA. As stated on pages 20 and 21 of the draft Pennsylvania WIOA Combined State Plan, the proportion of the Pennsylvania population age 55 and older is expected to increase. In fact, the U.S. Census Bureau estimates that 28 percent of Pennsylvania's population will be over 60 by the year 2030, which represents an increase of close to 35% from 2010 (Source: U.S. Administration on Aging Projected Future Growth of the Aging Population). Under WIA, our national workforce development system significantly underserved older workers at a time when they increased as a proportion of the total workforce and became increasingly diverse as a population in need of workforce development services. As early as 2003, GAO reported that some of WIA's performance measures created disincentives for program administrators to provide older workers from receiving more in-depth WIA services. Developing a combined state plan under WIOA provides Pennsylvania with an opportunity to correct this systemic bias against serving the employment and training needs of its older workers, many of whom continue to struggle and suffer since the Great Recession. In this spirit, we offer the following concerns and recommendations.

Response: We appreciate the comment in support of our planned actions.

- Recognize in the Combined Plan that older workers will greatly comprise the state’s “most in need and hardest to serve” (on page 7) given the projected growth in Pennsylvanians 60+ (see pages 20-21).

Response: We appreciate the comment and have added language to page 20 of the plan.

- Include additional information about SCSEP. SCSEP remains the largest federal workforce development program targeted to serve older workers. The Government Accountability Office has identified SCSEP as one of only three federal workforce programs with no overlap or duplication. Including this additional information would promote greater awareness of SCSEP in the workforce development community. This additional information could be included in:
 - Section 2.9 on pages 11 and 12 regarding those who are low-income, recipients of public assistance, skills deficient and possess barriers to employment;
 - On page 20 of the Combined Plan under paragraph regarding the state’s population is growing older;
 - On page 21 of the Combined Plan in the paragraph regarding those who need to work and thus do not plan to retire;
 - On page 29 as an example (such as TANF and SNAP) in the last bullet regarding integration and alignment of workforce program; and
 - On page 41, this additional information could be included in an expanded description of the bullet noting the State’s Area Agencies on Aging and National Grantees provision of SCSEP services.

Response: We appreciate the comment and have added some of the recommended language on page 41.

- Promote and support stronger SCSEP - One Stop collaboration. SCSEP has been a mandatory partner at One Stop Centers under both WIA and WIOA and are actively engaged in improving outcomes for older workers. We are concerned about the utilization of the SCSEP funds to pay for One Stop infrastructure costs, especially since SCSEP, by law, can expend very little on administrative and other program costs (The Older Americans Act requires that grantees expend at least 75% of their program costs on participant wages and fringe benefits). The Combined Plan makes no mention of the proposed cost sharing the draft WIOA regulations may allow. Therefore, we recommend that Pennsylvania allow that the costs of SCSEP participants/enrollees assigned to the One Stop (as noted page 41 of the Combined Plan be counted toward One Stop infrastructure cost allocation and that the costs be proportionate. This would minimize the potentially negative impact on SCSEP - One Stop collaboration as well as reflect the true value being provided by SCSEP to the One Stop.

Response: We appreciate the comment and will consider this recommendation in a separate policy document to the PA CareerLink® centers.

- Serve the wide diversity of older workers and their needs more effectively through stronger SCSEP-One Stop MOUs. An effective MOU should include a method for referring participants between the One Stop operators and partner programs, including those programs that serve

subpopulations with barriers to employment. Too often under WIA in many states, One Stops automatically referred all older job seekers to the SCSEP representative at the One Stop for services without screening for the individual's specific needs. SSAI recommends on pages 29-30 of the Combined Plan that the MOU between Local Boards and required programs define a process to ensure that individuals are screened to determine the best set of services to receive at the One Stop center, as older individuals' employment needs vary based on their individual circumstances and may require assistance from either WIOA Adult services or SCSEP or both.

Response: We appreciate the comment and will consider this recommendation in a separate policy document to the PA CareerLink® centers.

- Invest in the skills and knowledge of One Stop front line staff to assist the diversity of older workers. Serving older workers has never been a priority of the public workforce system, especially since the end of JTPA. SCSEP is the notable exception, but it is targeted to serve a specific subpopulation of older workers: the poor and near poor. To achieve the vision of a truly universal system, front line staff of the American Job Centers/One Stops would benefit greatly to be trained to provide staff-assisted services to an older population that is larger and more diverse in their workforce development needs than the SCSEP-eligible population. We recommend that Pennsylvania Department of Labor and Industry collaborate with the Pennsylvania Department of Aging to develop and implement ongoing skills development for the staff of both agencies to cross-train in both aging and workforce development in support of the Combined Plan's recognition that well-trained staff ensures successful cross-program alignment (page 30).

Response: We appreciate the comment and will consider this recommendation in future discussions between the PDA and L&I.

- Collect and report more detailed data to ensure that older Pennsylvanians are appropriately served under WIOA. We are concerned that the proposed WIOA regulations' implementation of the earnings indicator performance measure will continue to discourage service to older job seekers since many older workers work part-time by preference or involuntarily. Since only total wages are reported for each exited participant, there is no provision for reporting the wages expressed as dollars per hour to more accurately reflect outcomes. With regard to the Assessment of Programs and One Stop Partners on page 57, we recommend that Pennsylvania revise reporting to wages per hour rather than total wages.

Response: We appreciate the comment and will consider this recommendation.

- SCSEP participants are good candidates for jobs. We appreciate the acknowledgment on page 205 of the Combined Plan that because more than 60% of current SCSEP participants have at least a high school diploma, these are a strong match for the employment projections found in Appendix X (page 253). The positions listed in Appendix X seem more appropriate for a larger number of SCSEP participants than the occupation of School or Employee Bus Transportation listed on page 204. Many SCSEP participants, due to eye-sight issues related to aging, are limited in their ability to drive.

Response: We appreciate and understand your comment. However, we are aware of school bus companies that actively recruit retirees for part-time bus driver positions.

James Coley of **Southern Alleghenies Planning & Development Commission** offered multiple comments to include:

- The plan opens with an outline of five goals. In goal #3 Increase Work-Based Learning Opportunities for Youth on page 13 in that goal's subsection 3.1, it states that "recognizing the new priority on OSY, the commonwealth will identify models and effective practices, including for recruitment, flexible enrollment (ex. Self-attestation) to help local area staff successfully meet the needs of those individuals". On page 86 of the plan, it restates the following intent" to ease burdens on both applicants and providers and serve out-of-school youth who are most in need, the commonwealth will allow self-attestation for out-of-school youth for the purpose of WIOA eligibility determination". This intent is commendable but is inconsistent with their guidelines to local areas. On December 23, 2015, the L&I issued Workforce System Guidance No.04-2015, Subject- Self-Certification and Telephone Document Inspection Verification. In that document on page 4 it states that "Neither applicant statements nor self-attestations may be used for family size/family income criteria in determining eligibility." This is not only inconsistent with the state plan's intent as previously stated but also is inconsistent with the US Dept. of Labor's traditional allowance of the use of these forms under WIA. The guidance and plan were both generated by the commonwealth and coexist in violation of each other. The plan will take effect July 1, 2016, however, the referenced guidance has been in effect since Dec, 23 of last year. These youth that the system has targeted for services tend to lead a non-traditional nomadic life style. As a result, traditional document sources are difficult to obtain. The use of these banned forms was very helpful and used often in bridging this issue. This guidance statement has created an unnecessary burden on local area WIOA operations and will result in an increased number of recruited out-of-school youth not completing the enrollment process and will reduce the local area's ability to meet enrollment and expenditure level requirements. This issue needs immediate attention.

Response: To ease burdens on both applicants and providers and serve out-of-school youth who are most in need, the commonwealth allows for self-attestation. The guidance issued by the commonwealth is consistent with the state plan's intent. Such guidance does not allow self-attestation as it relates to income, which is consistent with the policy direction of other core partners in this plan. L&I is collaborating with its partners to create other means for verifying income or the lack of such income for eligibility purposes.

- Later on that same page, the state recognizes the challenges in increased emphasis in serving OSY when it states that the "commonwealth will work closely with each LWDB to negotiate levels of performance that reflect the needs and challenges of the new service population. In this way, local areas will not be penalized for enrolling high need and difficult to serve individuals who are the focus of WIOA youth activities." In addition on page 14 under subsection 3.5 of that goal, it states that "The commonwealth will work with the US Departments of Labor and Education, and also with local boards, to ensure that statistical models and negotiated performance levels are established and calibrated so that they accurately reflect the profiles of out of school youth being served within the commonwealth and in each area." In practice, there was a past process that was used in a previous DOL funded workforce development program that accomplished this. It was called the regression model. Each targeted hard to serve client population group was weighted based upon its drag on performance. Each local area's initial performance level was negotiated on general conditions in the local area, then at the conclusion of the program year, the regression model was calculated. The initial negotiated performance

level was then adjusted based upon the actual enrollment levels of the hard to serve populations. Since this was based upon hard to serve client groups and not on school status, the entire mix of clients affected the final performance measure. If emphasis on the impact of disconnected out of school youth is desired, the weighting could be adjusted accordingly.

Response: We appreciate your comment and will work closely with the US Departments of Labor and Education to ensure the statistical model reflects actual conditions experienced and the characteristics of participants.

- The first goal is Establish Career Pathways. On page 10 in subsection 1.9 of that goal it states that “the Commonwealth will establish statewide and regional lists of industry –recognized credentials. The lists will include academic credentials as well as credentials demonstrating job readiness and the attainment of “soft skills” through workforce preparation activities”. This last statement is especially critical for youth/young adults who lack or have limited work experience. A credential demonstrating job readiness and the attainment of “soft skills” should include an employer evaluation process to substantiate the work readiness of the individual. Evaluations by an employer in a work environment based upon employer work readiness standards should be one basis for documentation of work readiness attainment. Correspondingly, individuals which achieve the attainment of work readiness and soft skills should receive credit toward the credential attainment performance measure. This credit has not always been recognized in the past.

Response: The commonwealth is open to consideration of all suggestions for the development of industry-recognized credentials.

Debbi Prosser of **Southern Alleghenies Planning & Development Commission** offered multiple comments to include:

- Good afternoon, I am Debbi Prosser and I have the pleasure of serving as the Regional Coordinator for the Southern Alleghenies PREP Network. As such I have the opportunity to work with economic, community and workforce development professionals as we join forces to assist the businesses in the 6 county Southern Alleghenies Region to prosper and grow.

First let me say that we work together well in the Southern Alleghenies Region. The Workforce Development staffs and CareerLink staffs were included in our PREP Network from day 1. We didn’t need to be coached or incentivized to build a team that included workforce development and economic development professionals because that is routine business for us.

Workforce Development is at the heart of many of our discussions in regard to the current and future state of our region. So I am pleased that the Combined Plan has been presented for comment.

In reading through the plan I was impressed by:

- The over arching goals
- The comprehensive approach
- The recognition that multiple parties will need to be mobilized to accomplish the objectives.

- And the desire to more fully engage the business community through industry partnerships and in policy positions.

Response: We thank the commenter for highlighting the positives she sees in the State Plan.

- I am not qualified to speak to some of the more specific workforce and training strategies but I have to admit that the plan does raise a few concerns for me.

The first is the impression that we are creating a “one shoe fits all” scenario. This concerns me because it assumes that all regions in the commonwealth have the same needs and function in the same manner and I have not found that to be the case.

Urban centers have very different economic conditions than rural areas and limiting the ability of the workforce system to be responsive the customer’s needs in our region based on statewide objectives would not be to our benefit.

My experience in economic develop is that the best efforts are based on the ability to be agile so that we can be responsive to the customer’s ever changing needs.

When provided Jobs 1st funding we learned a few lessons through the implementation of that program. One of those lessons was that the workforce development system was far less agile due to the regulatory environment than the economic development community is.

I understand that regulations are set upon us from the US Government but I would ask that as the Commonwealth finalizes this plan that you consider what additional regulations are being placed on the PA workforce system by the Commonwealth. I would suggest that any additional regulations that are not mandates from Washington will likely not serve us well, and will inhibit our ability to be agile in addressing our [the paragraph ends here]

Response: We appreciate the comment and note that the State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved.

- Lastly, I would like to speak to the mandates for the Workforce Development Boards that are included in the plan regarding investments in post-secondary education for job seekers.

I certainly recognize the competitive advantage that PA would have if we would be able to promote that we have an authentic well trained workforce.

Conveniently, our Workforce Development Board has always placed great emphasis on raising the educational attainment levels of our residents through training and has sought out funding for incumbent worker training on a routine basis. But the mandates the will tie them to arbitrary and significant training expenditure benchmarks will force them to redirect resources from other very valuable and productive services for both the job seekers and employers.

I would hope that the plan can be reworked to provide more flexibility for the regions. We understand better than anyone the needs of our employer community and job seekers. If the commonwealth would allow us to work closely with the Workforce Development Board and the CareerLinks to support training that makes sense and addresses the needs of our employers

rather than be tied to specific expenditure benchmarks I believe our region would be much better served.

Thank you for the opportunity to provide comment on this very important plan.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

Stephen Howsare of **Southern Alleghenies Planning & Development Commission** commented: The state plan contains multiple references to the increased role of technology in service delivery and enhancing the workforce system access through its use. We urge caution when you consider greater reliance on technology to serve our customers. While roughly 90% of Pennsylvanians have access to high speed, wired broadband internet, the Southern Alleghenies region falls far short of that level of connectivity needed to truly utilize technology in service delivery. In fact, drive just a few miles from this Career & Technology Center and you won't be able to use a cellular telephone let alone access a high speed internet connection.

Furthermore our customers, especially those with significant barriers to employment, do not have the skills needed to even undertake what you make consider a simple task- enrolling on Job Gateway. The jobseekers in our region tend to be older with no post-secondary education. Our Introduction to Computer workshops are often filled with those who have never sat in front of a monitor, turned on a CPU, or moved a mouse. Once they've learned the basics, they return to our CareerLinks to use the computers to access Job Gateway and, with assistance from our career counselors, continue with their job search activities.

Likewise, those jobseekers with some degree of computer literacy utilize our CareerLink computers to connect to Job Gateway. Many have no other access to technology due to the cost associated with maintaining home internet connections.

In summary – It would be a tremendous miscalculation on the part of the state workforce leaders to assume that our customers:

1. Have access to the requisite levels of connectivity needed utilize a workforce system that relies greatly on technology for delivering services
2. Have the requisite level of computer literacy to utilize a system that deploys services through the use of technology

You would however be correct in acknowledging that the CareerLink offices and their trained staff are vital resources to our communities and the jobseekers and employers they serve.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

Martin Culp of **Southern Alleghenies Workforce Development Board** offered multiple comments to include:

- para. 4.4 – The commonwealth says it will specifically require LWDBs to provide funding to Industry partnerships. We strongly have and will continue to support industry partnerships but we need clarification on the topic. Does the commonwealth intend to establish any parameters for requiring funding to Industry Partnerships? Is it a specific percentage? Can it be in kind? Depending on the local economic conditions, employer demand, and the availability of other funding sources, we recommend that the LWDB be given the discretion to determine the amount and form of IP funding that it can support.

Response: The commonwealth envisions Industry Partnerships as a state/local partnership and therefore expect local financial support of IPs. The commonwealth is drafting a policy that will address the use of WIOA funds for incumbent worker training.

- para. 2 - The commonwealth indicates that Local Workforce Development Boards and PA CareerLink® centers will be required to use between 5% and 10% of their funds to provide transitional jobs, as permitted under section 134(d)(5) of WIOA. Training and Employment Guidance Letter 3-15 defines transitional jobs as subsidized time-limited work experiences for individuals with barriers, inconsistent work histories, and the chronically unemployed. When employers interview and hire, they have an expectation that the employee will quickly become a productive member of their workforce and develop into a long term employee. Has the state considered the impact on the employers (i.e. workers comp/UC/lost production time), by requiring them to hire individuals without the necessary skills and that have no expectation of continued employment beyond the work experience? Please consider not putting a percentage target on transitional jobs and allow Local Workforce Development Boards and CareerLink® counselors to support transitional jobs on a case by case basis depending on the needs of the participant and employer availability.

Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs. Employer participation in the transitional jobs program will be voluntary.

Susan Whisler of **Southern Alleghenies Workforce Development Board** commented: My name is Susan Whisler and I serve as the director of the Southern Alleghenies Workforce Development Board. On behalf of board thank you for opportunity to provide input. We are encouraged that the plan takes a more comprehensive view of workforce development- that it's not solely the responsibility of Title I or Wagner Peyser. Beginning with the first page of narrative, there are numerous references to the workforce system- a comprehensive system that "aligns workforce priorities across multiple partners to ensure we are creating a skilled workforce." It identifies as a core challenge "workforce programs that operate in their own individual silos rather than being integrated into an overall system." It urges cross-program funding and programmatic integration yet the plan establishes training expenditure benchmarks for only Title I. Instead we urge you to consider setting broader benchmarks that encompass multiple programs and actually encourage cross-program/cross department integration and leveraged funding. This will ensure that individual program metrics and performance measures are not lost but rather recognized and aligned. Furthermore we urge the state to broaden the definition of what constitutes a training expenditure to include National Emergency Grants, Rapid Response, Trade, and associated staff costs, not unlike the stance taken by DOL in defining what constitutes work

experience. The Southern Alleghenies Workforce Board has long been a proponent of skills training. Even though we have seen our Title I funding reduced by some 40% over the past ten years, the board still allocates roughly 20% of its Title I dollars, 100% of its Rapid Response funding, and over 95% of the funding available through special National Emergency Grants in support of ITAs and OJTs. We offer significant financial assistance to our jobseekers yet every year training dollars go unspent. Many tell us that they need to return to the workforce as soon as possible- they can't spend the time in school. Also, many of the open jobs in our region do not require a credential but rather a good work ethic and clean record. If the proposed Title I training benchmarks and related requirements remain as outlined in the plan, it has the potential to dismantle an efficient and effective local workforce system. Yes, we can direct 30, 40 & 50% of our Title I dollars to training but at what cost? To comply with these benchmarks, funding will have to be redirected away from service provision. This will mean fewer career planners and business service representatives available to help the thousands of jobseekers and employers who need our assistance and we will be forced to reduce the number of sites where our customers can access services.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

Bill Findley of **Southern Alleghenies Workforce Development Board** commented: Let me begin by saying that each labor market region across the state is uniquely different. By that I mean the industry makeup of an area, the types of jobs available, the unemployment situation, and the ability to meet the changing demands of the economy. Across this region a commitment to the proposed training benchmarks cannot be supported by the economies across the region. Labor market numbers that measure projected job growth through 2022 tell us that an overall increase through this period is comparatively small with the majority of the increases confined to the service producing industries where training needs are minimal. Overall job levels are projected to increase by 6%. Another resource that speaks to this question is the listing of high priority occupations Here we find basically the same situation. Growth in occupations where little training is called for. In summary, I encourage you to take a closer look at jobs needed to meet local industry needs.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas in meeting the targets. We currently examine local-area job needs in determining which occupations are on the list of high-priority occupations, and we will continue to do so.

Susan Whisler of **Southern Alleghenies Workforce Development Board** offered multiple comments to include:

- The Southern Alleghenies Workforce Development Board (SAWDB) supports the comprehensive approach taken in the development of the state plan and the Governor's goals and objectives designed to create a strong and skilled workforce and a public system that meets the needs of employers and job seekers.

The SAWDB respectfully submits that to achieve the Governor's objectives, consideration be given to incorporating the flexibility allowed and encouraged by the WIOA. Pennsylvania is a very diverse state and this flexibility will enable boards like the Southern Alleghenies to be responsive to the needs of our largely rural job seekers and employers. Thank you for the opportunity to provide comments; they are offered with respect to the areas identified below.

Response: We appreciate the comment in support of the comprehensive approach taken in the plan. We note that the State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved.

- Training Benchmarks (WIOA Plan 2.1, p. 10) and Priority of Service (WIOA Plan p. 67): We request additional clarification as described below be considered with respect to Title I training expenditure goals: 1. Exclude dislocated workers from the training expenditure calculation as their eligibility is not based upon barriers. We believe this to be the intent but it is not clear in the language of the plan. 2. Exclude youth from the training expenditure calculation as all youth must have a legislative barrier to be able to participate in a WIOA-funded program. We believe this to be the intent, but it is not clear in the language of the plan. 3. Exclude the 10% administrative portion of Title I contracts when calculating the minimum training expenditures, mirroring how the 75% out-of-school youth minimum expenditure requirements are calculated. 4. Include all allowable training activities under WIOA section 134 as well as work experience and internships in calculating training expenditures. 5. Include PELL, scholarships and other forms of financial aid to offset the Title I training target. 6. Include training conducted under other funding, including but not limited to Trade Act, American Apprenticeship, H1-B, Rapid Response Additional Assistance, National Emergency Grants and National Dislocated Worker grant programs, to offset the training target. 7. Include one-stop partner program training expenditures for participants dual enrolled in the one-stop partner program and WIOA. We believe this to be the intent but a statement to that effect would make the section clearer. 8. Include the cost of assessment and case management necessary for participants to enroll in and successfully complete training. 9. Include the cost of registration, books, lab fees and required uniforms.

It is recommended that with respect to the goal of expending 50/60/70% of Title I training expenditures on individuals with barriers, additional clarification to this section be considered as described below:

1. Exclude dislocated workers from the calculation as their eligibility is not based upon barriers.
2. Include the local board definition of not earning a “self-sufficient” wage as one of the barriers.

It is recommended that the state plan also include a recognition that individuals with barriers may not always have the necessary skills, as required by WIOA §134, to succeed in training without further assistance from an adult literacy program or stabilizing social service assistance. PA CareerLink staff often refer these individuals for the assistance they need in order to be able to participate in training once their issues have been addressed.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets. We also note that administrative funds will not be included when calculating the training targets.

- The commonwealth, LWDBs and PA CareerLink® centers shall provide priority for Title I individualized career services and training services, as detailed below, to:

- (i) recipients of public assistance;
- (ii) other low-income individuals; and
- (iii) individuals who are basic skills deficient. (P. 67)

Comment: Similar to the recommendations with regard to the training expenditure thresholds, it is respectfully submitted that the state considers the following clarifications with respect to “priority of service”:

1. Exclude dislocated workers as their eligibility is not based upon barriers.
2. Include those individuals who fit in the local board definition of not earning a “self sufficient” wage as one of the barriers, or that these individuals be considered low income, thereby entitling them to a priority of service.
3. Reconsider including the requirement to inform individuals, other than veterans and their spouses, seeking to access WIOA services of their priority of service. WIOA is not an entitlement program. By informing individuals of their priority, there is a concern that this will lead to complaints where an individual is not provided services due to other reasons.

Response: We appreciate the comment and agree that the 70% requirement should only apply to the WIOA Adult and Youth funding streams and will make that clear in the state plan. We will also edit the plan to note that only individuals otherwise eligible for WIOA services should be informed of priority of service status. The commonwealth will also reassess the priority of service threshold on an annual basis.

- Performance Measures on p. 31

The Southern Alleghenies Workforce Development Board and its Title I providers are committed to high performance and will work to exceed the baselines that will be negotiated by the state and which are contained in the draft plan. Because states and local areas are still transitioning to WIOA and participants enrolled prior to publication of the measures will be included in the determination of the WIOA measures next year, it is respectfully suggested that consideration be given to lowering the targets for the performance measures to the baseline met by the state during its last year of performance under the Workforce Investment Act. This suggestion is premised upon the following:

1. The parameters for the calculation of the measures have not yet been issued by the USDOL and will not be issued until after the submission deadline for the state plan.
2. There are 3 new adult/dislocated worker measures for which there is no existing baseline established under previous legislation upon which to estimate performance.
3. There are 4 new youth measures for which there is no existing baseline established under previous legislation upon which to estimate performance.
4. The method for calculation of all the WIOA measures will not be the same as under previous legislation.

5. Data needed by states and local areas to manage performance is a challenge to obtain because it is partially based on the Wage Record, which is 9 months in arrears. As a result, course corrections cannot be made until the year after performance for the previous year has already been determined. Under WIOA, the U.S. Department of Labor is working on how to improve reporting. However, we are still working under the current reporting system.

6. The penalty to states for not meeting the WIOA measures can be as much as a reduction of 5% to the State's 15% portion of the grants (WIOA § 116(f)).

It is respectfully submitted that the state can set a lower baseline for performance in the plan while still encouraging and incentivizing local areas and regions to meet the Governor's thresholds. In doing so, local areas and the state can strive toward the Governor's goals without placing undue pressure and risk on the state and local system.

Response: WIOA presents many new performance measures and goals. For many, there is little or no baseline information. The targets as expressed in the plan represent a starting point for conversations among providers, partners, and policy-makers.

- Recognizing the Roles of State and Local Areas/Regions in the Plan

The Southern Alleghenies Workforce Development Board recognizes and applauds the Governor's goals for the citizens, residents and employers of our great state. It is the intent of our board and workforce partners to do all we can to bring these to fruition.

In enacting WIOA, Congress assigned roles to the states and to the local workforce development boards. The responsibility of the State Board can best be summed up by the language of WIOA § 101 (d)(12), which includes as a function of the State Board the responsibility to develop policies to promote statewide objectives and enhance the performance of the state workforce development system.

At the local level, pursuant to WIOA §107 (d), local elected officials together with the local boards are responsible for setting policies, approving how funds will be spent (the budget) and analyzing local conditions so that they can make determinations on the type, mix and investments in services and training with their WIOA allocation.

It is respectfully submitted that the state consider the benefit of allowing local boards the nimbleness embedded in the law to be responsive to local area needs, which vary across the state by incorporating as much flexibility as possible into the various sections of the state plan and into the policies that will be adopted to implement WIOA.

Response: We appreciate the comment and note that the State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved.

Local Elected Officials (Jeffrey Thomas, Chair) of **Southern Alleghenies Workforce Development Board** offered multiple comments to include:

- Training Expenditures: While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-

recognized credentials, the workforce system encompasses much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title I funds to training will negatively impact the delivery of valuable career and business services in our region. We anticipate reductions in program staff, including career planners and business services specialists, and also the downsizing or closure of some PA CareerLinks® in the Southern Alleghenies. The establishment of benchmarks based on a percentage of the local workforce area's federal allocations negates the many other valuable services the local workforce system provides to employers and job seekers. Each year the Southern Alleghenies Workforce Development Board allocates some 20% of its Title I funding and 100% of its Rapid Response dollars in support of retraining and each year a portion of these funds go unspent. Many of our residents are not interested in pursuing additional training; they simply want to rejoin the workforce.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- PA CareerLink® - Online Services as an Enhancement: PA CareerLink® centers serve as the storefront and face of and for delivery of services to businesses and job seekers in the commonwealth. While increasing the quantity and quality of online, self-service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society, the reality is that many of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Furthermore, considerable portions of our region are not serviced by high speed internet. Online services cannot replace face-to-face career coaching and mentoring as well as the many other hands-on training and other programs delivered at PA CareerLink(R) centers that lead to employment success and add value to our communities.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

Robin Youger of **Southwestern PA Area Agency on Aging** offered multiple comments to include:

- The planned actions to coordinate activities of SCSEP grantees with the WIA title I programs (p. 205) are sound. We maintain an effective partnership with all four CareerLink offices in our service area, and the One-Stop delivery system presents opportunities for both job-seekers and potential employers. Our seasoned Job Developer works diligently to ensure the development and execution of mutually-beneficial initiatives for consumers, partnering agencies, and communities in our service area through the CareerLink centers.

Response: We appreciate the comment in support of our planned actions.

- The planned actions to coordinate SCSEP with Older Americans Act activities (p. 206) are very effective when combined with complementary resources such as those available through the PA Link to Aging and Disability Resources. Participants, particularly those with disabilities, benefit most from this collaborative network and frequently discover types of assistance they would never have located without the SCSEP program, including supportive services (p. 217) that may

help them find or retain unsubsidized employment when they reach their duration limits with the SCSEP program.

Response: We appreciate the comment in support of our planned actions.

- We were honored to be used as an example of exemplary networking and job development in rural locations (p. 207). Our three counties are primarily rural and listed as such by the Center for Rural PA. This reinforces our belief that none of our counties should be designated as “urban” under Equitable Distribution criteria.

Response: We appreciate the comment as your agency was very deserving of recognition. The designation of "rural" means an area not designated as a metropolitan statistical area by the Census Bureau and is largely determined by zip code through the Rural Urban Commuting Area (RUCA) system

- The long-term strategy for engaging employers to develop and promote opportunities for the placement of SCSEP participants into unsubsidized employment (p. 207) works well in high-growth industries. However, this should be periodically reexamined as markets and needs change.

Response: We appreciate the comment and note that local markets and needs change. SCSEP subgrantees are provided with updated workforce development data on a regular basis to reflect such changes.

- Our SCSEP program has been successful in serving minority older individuals (p. 207) using the strategies discussed, including conducting extensive outreach through community groups and media, social and cultural group settings, chambers of commerce, and other outlets.

Response: We appreciate the comment in support of our planned actions.

- We agree with and support the decision to allow the identification of the types of community services needed, as well as the location of these needed services (p. 208; p. 215), to be done at the local level. Types and location of community services needed vary within our three-county service area, and we appreciate the ability to independently make these assessments and determinations on a local level.

Response: We appreciate the comment in support of our planned actions.

- We agree that ongoing local trainings (p. 212) and trainings conducted by the Department of Aging do contribute to the continuous improvement in the level of performance for SCSEP participants’ entry into unsubsidized employment (p. 208) because these provide SCSEP and agency staff with current examples of best-practices as well as provide valuable networking opportunities.

Response: We appreciate the comment in support of our planned actions.

- We agree that the subgrantee recruitment methods outlined (p. 213-214) are very effective in helping achieve the Most in Need performance goal.

Response: We appreciate the comment in support of our planned actions.

- On duration limits (p. 215), we would encourage a reexamination of reinstituting duration limits waiver factors, as well as the adoption of a plan to extend the durational limits for our most in-need demographics, including those age 80 and older, pre-911 veterans, and those with mental or physical disabilities. These participants greatly benefit from the SCSEP program. Unfortunately, more time is often needed to allow them to become job-ready. We feel reinstating discretionary use of duration limits waivers will better prepare these participants for more successful outcomes.

Response: The PA Dept. of Aging (PDA) understands the comment as it originally did allow for a waiver of the 48-month durational limit policy if a participant had at least one of seven waiver factors. PDA subsequently changed its policy to no waivers because of input from 85% of its SCSEP providers in 2011 to change the policy to no waivers.

- Finally, we appreciate the recognition given to our agency for the implementation of the computer training developed by one of our host agencies (p. 216-217). This training will continue and has been cited by several SCSEP participants as greatly improving their job performance.

Response: We appreciate the comment in support of the policy.

Community Legal Services and the Community Justice Project submitted comments on behalf of **Success Against All Odds** and **Just Harvest** as follows:

- Community Legal Services (CLS) and the Community Justice Project (CJP) submit these comments on behalf of Success Against All Odds, Just Harvest, and the thousands of clients CLS and CJP represent every year who seek to better their lives through better jobs in strong support of the Wolf Administration's proposed Workforce Innovation and Opportunity Act (WIOA) state plan, which was published for public comment on December 28, 2015. Our comments focus on: (i) priority of service for recipients of public assistance; (ii) Career Pathways; and (iii) Transitional Jobs (subsidized employment).

Response: We appreciate the comments provided.

- Priority of Service: As advocates for low-income families we had a strong interest in assessing whether the proposed WIOA state plan ensures access to job training opportunities for parents whose families receive public assistance. We see this as critically important in order for these parents to acquire the skills and credentials needed to qualify for jobs that are in-demand, pay a family sustaining wage, and will allow them to be self-supporting.

Our Position: We think the plan, as proposed, does a good job of addressing the training needs of low-income parents through strong and mandatory provisions implementing WIOA's priority

of service provisions for recipients of public assistance and other low-income persons, as well as by setting benchmarks for providing training services to these high needs priority groups. (See, Proposed WIOA State Plan, pp. 10-12, ¶¶ 2.1 and 2.11) The proposed plan also includes specific guidance to Local Workforce Development Boards (LWDBs) and CareerLinks on what “priority of service” means and how it works, which we think is absolutely essential to successful implementation of priority of service for the high needs groups targeted by WIOA. (See, Proposed WIOA State Plan, pp. 67-70) Among other benefits, access to training services for recipients of public assistance would enable low-income parents to qualify for WIOA Title I funds to pay for short-term 12 month or less community college job skills training programs. This type of training can lead to in-demand jobs that pay very good wages. Currently, parents whose families receive public assistance are unable to participate in such programs because short-term training programs do not qualify for financial aid and these parents cannot afford the tuition. Access to Individual Training Accounts (ITAs) funds through LWDBs and CareerLinks to pay tuition for short-term training would provide an important avenue to self-sufficiency for parents currently forced to rely on public assistance to support their families. The Department of Human Services (DHS) runs a program, called KEYS, that has proven very successful in assisting parents receiving Temporary Assistance for Needy Families (TANF) in enrolling in and completing community college Associate Degree programs. Many of these parents are either better suited for or would prefer to participate in the short-term 12 month or less job skills programs offered by community colleges, but cannot do so because they cannot get financial aid for these programs and cannot afford the tuition. Access to ITAs would solve that problem for these parents.

Response: We appreciate the comments in support of the plan. We echo the commenter’s suggestion that KEYS has proven successful in assisting parents receiving TANF enroll in and complete community college degree programs and note that we discuss utilization of KEYS in the plan as a means to increase access to postsecondary education.

- Career Pathways: We were also very interested in whether the proposed WIOA state plan provides for Career Pathways training programs. Career Pathways programs provide adult education (literacy/English-as-a Second Language/GED), career counseling, and transition to postsecondary education and job skills training; these have proven highly successful. States are strongly encouraged by WIOA to develop and operate such programs. To give a sense of what a difference access to Career Pathways programs could make for families on public assistance, consider that over forty percent of adults receiving Temporary Assistance to Needy Families (TANF) lack a high school degree or GED. Less than three percent of these parents are participating in GED programs. The DHS does not operate Career Pathways or any other adult education programs for parents on TANF. Providing access to Career Pathways programs to parents on public assistance through LWDBs and CareerLinks would provide a pathway from public assistance to employment at family sustaining wages - a benefit not only to these families, but to the state as well. We were very pleased with the provisions in the proposed

WIOA state plan regarding Career Pathways (See, Proposed WIOA State Plan, pp. 8-10)

Our Position: The proposed WIOA state plan would require that Local Workforce Development Boards (LWDBs) and CareerLinks develop and operate Career Pathways programs, as defined in WIOA, and that such programs provide for entry at the literacy, ESL, or GED level . We strongly support these provisions.

Response: We appreciate the comments in support of the plans requirement that career pathways include entry points at the literacy, ESL and GED levels.

- **Transitional Jobs:** WIOA allows states to spend up to 10% of Title I funds on transitional jobs, i.e., subsidized employment, opportunities for participants. Access to transitional employment slots for low-income persons can provide valuable work experience that can lead to permanent employment. This is particularly important for recipients of public assistance, many of whom want to work but lack work experience.

Our Position: The proposed WIOA state plan includes a requirement that LWDBs and CareerLinks use between 5% and 10% of their funds to provide transitional jobs and that they ensure that priority of service for transitional jobs is afforded to individuals who qualify for priority of service. (See, Proposed WIOA State Plan, p. 70) We strongly support this.

Response: We appreciate the comment in support of the plan's requirement that 5 to 10 percent of local board funds be used to provide transitional jobs.

- **Legal Basis and Need for Strong Priority of Service Provisions:** WIOA, like its antecedents -- the Workforce Investment Act and the Job Training Partnership Act -- , places special importance on serving high needs groups. According to WIOA:

Priority for individualized career services and training services must be given to:

- (i) recipients of public assistance;
- (ii) other low-income individuals ;and
- (iii) individuals who are basic skills deficient

WIOA strengthens the priority of service requirement by, for example, eliminating the provision under the Workforce Investment Act that priority of services only applies when funds are limited. Under WIOA priority of service must be provided, regardless of funding. Strengthening the priority of service requirement was clearly needed, as a declining number of persons with barriers to employment were served under WIA, despite its priority of service requirement. National data show that only 48.7 percent of adult “exiters” who received training and/or intensive services through the WIA Adult funding stream were “low-income individuals” in Program Year 2013 – a marked decrease from 71.3 percent in Program Year 2001. And only 3.8 percent of those served in Program year 2013 were TANF recipients.¹

Over the past decade and a half, WIA delivered training services to a declining share of low-income individuals, and WIA served a far lower percentage of low-income adults than the predecessor federal law in place before 1998, the Job Training Partnership Act, which required that 90 percent of the funds for adults were targeted for those who were low-income. The underlying intent of WIOA, WIA, and the JTPA, and past failure by states to realize the goal of priority of service, provide strong reasons to support the Wolf administration's approach to this critical element of WIOA its proposed state plan.

Response: We appreciate the comments in support of the administration's approach to implementing priority of service provisions.

- **Recommended Clarifying Edits to the Proposed Plan:**
Priority of Service Benchmarks: The Proposed WIOA State Plan takes an important step by including at ¶ 2.1 on pages 10-11 a requirement that local agencies meet certain phased in benchmarks for the percentage of Title I funds to be spent on training and the percentage of those funds that must be spent on “low-income individuals and individuals with other barriers to employment.” 2.1 The commonwealth will establish benchmarks for how much WIOA Title I funding must be used for training by local areas to include a set-aside to be used for new and innovative approaches. In Program Year (PY) 2016, at least 30 percent of Title I funding must be used on training, of which 50 percent must be spent on low income individuals and individuals with other barriers to employment. In PY 2017, at least 40 percent of Title I funding must be used on training, of which 60 percent must be spent on low income individuals and individuals with other barriers to employment. In PY 2018 and thereafter, at least 50 percent of Title I funding must be used on training, of which 70 percent must be spent on low income individuals and individuals with other barriers to employment. The commonwealth will establish a technical assistance group to support local areas and their service providers in meeting the benchmarks and allow for the sharing of best practices. The benefit of such a benchmark is that it could potentially ensure that local agencies are giving priority for Title I training services to the high needs groups that Congress prioritized, namely, recipients of public assistance, other low-income individuals, and basic skills deficient individuals. We stand fully behind the intent of this provision, but feel it is not tied tightly enough to its objective. The benchmarks for percentage of those provided training services should be linked directly and solely to those groups entitled to priority of services under WIOA. This would best be done by adding a definition of “low-income individuals,” tying it more precisely to the federal WIOA Priority of Service groups, and by deleting the “individuals with other barriers to employment” language. These two changes would align the benchmark with the priority groups established in WIOA and the measurements used by the federal Department of Labor to track whether state are meeting priority of service goals. According to the Center on Law and Social Policy, the summary administrative data collected by U.S. Department of Labor (DoL) (in the “WIASRD Data Book”), from which state performance with regard to the Title I Priority of Service requirement can be publicly monitored, uses “low-income individuals” as its key data field. DoL collects data from each state regarding the characteristics of all participants served in the Title I program, including specific data on

“exiters” who received training services funded by Title I-Adult dollars. These data also show the percent of such exiters who are “low income” as well as the subset of those low-income individuals who are public assistance recipients. The larger group of low income individuals is an excellent proxy for the three types of individuals that are required to be given priority of service for Title I-Adult funding (low income, public assistance recipients, and basic skills deficient).³ Tying the proposed state benchmarks strictly to “low-income individuals” would allow an “apples to apples” comparison with the federal data related to priority of service. Including “individuals with other barriers to employment” does not allow an “apples to apples” comparison with the federal data and, therefore, would make it more difficult to determine whether local agencies and the state are meeting priority of service goals.

Here is how we think the provision should read:

The commonwealth will establish benchmarks for how much WIOA Title I funding must be used for training by local areas to include a set-aside to be used for new and innovative approaches. In Program Year (PY) 2016, at least 30 percent of Title I funding must be used on training, of which 50 percent must be spent on low income individuals and individuals with other barriers to employment. In PY 2017, at least 40 percent of Title I funding must be used on training, of which 60 percent must be spent on low income individuals and individuals with other barriers to employment. In PY 2018 and thereafter, at least 50 percent of Title I funding must be used on training, of which 70 percent must be spent on low income individuals and individuals with other barriers to employment. The commonwealth will establish a technical assistance group to support local areas and their service providers in meeting the benchmarks and allow for the sharing of best practices. For purposes of these benchmarks, “low-income” means recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient -- all of whom are entitled to priority of service under WIOA Section 134(c)(3)(E). Lastly, we note that the Section with detailed Priority of Service guidance also includes a benchmark provision for training services to groups entitled to priority of service (see, page 68). This provision differs slightly from the one, above, at Section 2.1 on pages 10-11 in that it would require that LWDBs and CareerLinks meet a seventy percent requirement right away without a phase-in period. We are comfortable with either approach.

Response: We appreciate the comment and will take it under advisement as future policies are developed and benchmarks are revisited. We note that the final plan includes a statement that the state will revisit training benchmarks annually, which will also include review of the percentage of training funds for populations with barriers. We also note the commenter’s view that there is inconsistency between the training benchmarks in Goal 2.1 and the priority of service language on page 68. In response, we would like to clarify that the target population under the training targets in Goal 2.1 is slightly broader than the strict priority of service populations defined on page 68. While those with barriers likely also meet priority of service definitions, it is possible that some may not. This gives local areas a bit more flexibility in meeting the training targets set in Goal 2.1.

Leslie LaBarte of **Sugar Grove Free Library** offered multiple comments to include:

- After looking over the draft plan, I feel that out in Sugar Grove, we already do a lot of those tasks. I am frequently encountering patrons that have zero tech skills and have been let go because
 - their jobs became too technical and they were never given the extensive repetitive training that I'm finding some older adults require
 - their businesses have closed and this was the only job they had ever known
 - they have been laid off and are being required to search for other employment

Many come here after having a terrible experience at the local CareerLink. So I would like to see added additional training for CareerLink staff in dealing with people with zero tech skills. I know it couldn't be added to the Youth section, however, I think older adults are in just as much need as the youth. Plus, this could be something they are already trained on, but I am just going by the frustrated and often tearful patrons that come here after being sat at a computer at CareerLink and being expected to know how to open a word document, let alone create a resume. Frankly, I feel since libraries are doing some of these jobs and our funding is usually on the chopping block, that we should also be receiving funds for these projects. I have spent many days teaching basic computer skills, internet skills, (which includes the fear of entering personal info online) and then job skills to help just 1 person find a job, even down to helping them know how to dress and what kinds of questions they might be asked on an interview. Then it is usually within the next week or 2 that I am doing it again for someone else, while my assistant and I are constantly networking the job market in our area, keeping our ears open to who might be hiring or engaging business owners to see if they know of anything.

Response: We appreciate your comments about services to jobseekers provided by your library and the expanded role that could be played. We note that we made further reference to libraries as system partners on pages 11, 42 and 48 of the final State Plan.

- This would all be perfectly fine if I had a staff, but currently there is myself and a part-time assistant because we don't have funding for a 3rd person. We are trying to serve our end of Warren County and our community the best we can, but since we are already doing the trainings, outreach, and offering internet services for many hours during the day. I actually just had a lady walk in saying the CareerLink is closed from 12-1 and that is inconvenient because she has to wait for someone to come watch her mother before she can then drive 20 min to Warren. She has 2 masters degrees and a license and can't afford internet at her home and as of today has no income coming in after the non-profit she was working at lost funding and couldn't afford to keep her. These are the issues facing my community and what we are already doing to help our community. We are not always great at tooting our own horns, but we are important to our communities. Please consider adding libraries to the draft plan.

Response: We appreciate the further comments about services provided by the library to jobseekers and the additional challenges that exist in rural communities.

William Coiley of **Suncom Industries, Inc.** commented: My name is William Coiley and I am the Procurement Manager for Suncom Industries, Inc., Northumberland, PA.

I have spoken to several of our business customers and they have asked me to formulate a letter to the Commonwealth in support of “Choice”, as an important right of all Pennsylvanians with disabilities when it comes to seeking and identifying employment opportunities.

Many of our customers have toured Suncom Industries and have been introduced to a wide group of Individuals that work on their respective projects/jobs...and many have returned for repeat visits to offer praise and congratulations on the success of their completed work.

The following is a list of customers with their identifying names that wish to offer support for the Individuals “Choice” while at the same time, respecting the Federal Government 14(c) program.

Buzzy, Inc.....Diane Oxenrider
Escopac.....Brian Kingston
First Quality Products.....Ryan Crawford
USP Lewisburg.....Patrick Ramirez
Vargo Outdoors.....Brian Vargo
Passage Foods.....Camden Buscko

Response: We appreciate the comment and await the release of final regulations, guidance, and technical assistance on Section 511 Limitations on Use of Subminimum Wage. The WIOA state plan does not include any provision to "eliminate" the FLSA 14c certificate program. Rather, new requirements in WIOA and from the federal Centers for Medicare and Medicaid Services are requiring states to offer more resources to people with significant disabilities to become employed in a competitive integrated job. CMS rules in particular are implementing funding rules that, after March 2017, will no longer allow federal waiver funds to service individuals in settings that segregate and isolate.

Maureen Cronin of **The Arc of Pennsylvania** offered multiple comments to include:

- The Arc of Pennsylvania is a statewide nonprofit organization that provides advocacy and resources for citizens with intellectual and developmental disabilities and their families. It was established in 1949 and currently includes 34 chapters in 57 counties and over 8,000 members across Pennsylvania. The Arc is a grassroots, member-driven organization led by people with disabilities and their families. Local chapters provide services and advocacy for individuals with intellectual and developmental disabilities and their families, and most of our chapters provide services as well. Thank you for this opportunity to comment on the WIOA Combined State Plan. We approach the issue of employment for people with disabilities uniquely, as we are foremost advocates and also providers of supported and sheltered employment. Our chapters and members across the state are personally and professionally impacted by the changes and improvements proposed in the combined state plan. The Arc of Pennsylvania is proud of the work our chapters have done to support employment outcome for people with disabilities. Notably, ACHIEVA (which oversees The Arc of Greater Pittsburgh, The Arc of Beaver, and The Arc of Westmoreland) has made the commitment to transition away from sheltered workshops settings and develop community opportunities for those they support. The Arc of Washington County has successfully transitioned individuals from sheltered settings to community-based employment using the Discovery model; additionally, many of our chapters have staff certified to provide Discovery and Customized Employment services for people with the significant disabilities. Our comments are informed by this perspective of prioritizing issues that most

impact people with disabilities and their family members; please note that our comments focus mainly on the Office of Vocational Rehabilitation's portion of the plan.

Response: We appreciate the comments.

- The Arc of Pennsylvania strongly supports the Commonwealth becoming an "Employment First" state (pg 12). The state needs an Executive Order that delineates the responsibilities of the Department of Human Services, Pennsylvania Department of Education, and Department of Labor and Industry in carrying out an Employment First policy. Without an Executive Order in place, an Employment First policy will not have consequence or impact in Pennsylvania.

Response: We appreciate the comment in support of an Employment First policy and note that the plan states that "Employment First" will be the policy of all executive branch agencies under the jurisdiction of the Governor in serving persons with disabilities. An Executive Order was issued by the Governor on March 10, 2016.

- We recognize that WIOA puts significantly more responsibilities on the Office of Vocational Rehabilitation (OVR). The Arc of Pennsylvania is pleased that OVR is focusing such efforts on youth with disabilities age 14-21, as evident in the draft plan. We urge OVR to consider that plans to provide pre-employment transition services (including internships and community based work experiences) to students with complex needs must be individualized, based on interest, and must consider identifying the conditions necessary for the student to be successful in employment. We urge OVR to include travel training in the expanded services for transition age youth (pg 146), as transportation is critical to community employment for people with disabilities.

Response: We appreciate the comment in support of the plan and OVR's efforts in providing pre-employment transition services to students with disabilities. OVR's long term goal is to have every student with a disability having a least one paid work experience prior to graduation. Travel training will be made available to OVR customers as outlined on their IPE.

- We commend OVR for their work to prepare for these changes, particularly preparing for new pre-employment transition responsibilities by planning for a point of contact for Local Education Agencies (LEA) in each OVR district office (pg 117) and initiating a Discovery & Customized Employment pilot (pg 146). The Arc of Pennsylvania looks forward to the outcomes of the Discovery pilot currently under operation in the Harrisburg, Washington, and Philadelphia areas.

Response: We appreciate the comment in support of replication of the Discovery & Customized pilot.

- Additionally, we applaud OVR for its shift towards blending customized employment and supported employment services – helping providers become certified to provide customized employment services is key to ensuring the quality of customized employment services for people with the most significant disabilities (pg 144). We remain concerned that despite efforts to anticipate staffing needs of OVR in the coming years (pg 123), overall the agency needs a greater staff contingency to take on the increased responsibilities under WIOA.

Response: We appreciate the comment in support of the plan. OVR has designated a Rehabilitation Specialist position implementing a proactive OVR Recruitment Plan for the purpose of actively recruiting qualified Vocational Rehabilitation Counselors, Vocational Rehabilitation Counselors for Deaf and Hard of Hearing, Orientation & Mobility Specialists and Vision Rehabilitation Therapists within Pennsylvania and nationwide to fill current and future anticipated vacancies. OVR acknowledges a need for greater staff contingency to take on the increased responsibilities under WIOA and the recently approved OVR-ODP MOU Interagency Funding Agreement will provide necessary resources to enable the agency to move forward with hiring dedicated VRCs to serve students/individuals with ID and Autism.

- The Arc of Pennsylvania strongly supports the excellent efforts OVR outlines in this plan to work in and with LEAs, in order to strengthen the transition process and employment outcomes for students with significant disabilities. Particularly, we highly support OVR's plan to cross-train OVR staff and LEA staff (pg 117); this is critical to improving the transition process for students with disabilities and ensuring that families know their options and rights related to employment services. Our primary concern in this time of transition is that the changes and improvements to services do not inadvertently hurt youth with disabilities. As young adults with disabilities graduate high school and sub-minimum wage settings are no longer considered as employment transition options, families are losing a model that guaranteed their child with a disability would have transportation and activity during the standard work day. The Arc of Pennsylvania unequivocally supports living-wage, community-based employment for people with disabilities; we also recognize that jobs in the community come with different obstacles to success, including different schedules and transportation considerations. The Arc of Pennsylvania is concerned that, due to the more irregular nature of employment in the community, young adults with disabilities could inadvertently be forced into non-paying volunteer positions or day programs simply because these options offer a steady schedule and regular transportation. While sheltered workshops are not the consummate model for employment of people with disabilities, we know that individuals with disabilities have a sense of accomplishment from going to work and earning some money. It is essential that the opportunity to have a paying job is preserved for youth with disabilities as they transition from high school.

Response: We appreciate the comment. OVR continues to identify and develop innovative strategies and supports for individuals with disabilities such as expansion of Customized Employment and Discovery pilots while we await the release of final regulations, guidance, and technical assistance on Section 511 Limitations on Use of Subminimum Wage.

- Traditional vocational assessments and supported employment practices have not resulted in community jobs for people with the most significant disabilities. While cognizant that OVR is waiting for regulatory guidance from the Rehabilitation Services Administration, OVR must delineate a clear plan for how students newly eligible for pre-employment transition services will be designated for OVR supported employment services and addressed in Order of Selection Criteria (pg 135-136). These individuals have already been denied as non-employable, or would be rejected as non-employable, under existing criteria. Specifically, we request clarification on:
 - What is the specific plan to address meeting this requirement and ensuring that individuals with the most significant impact of disability have access to expanded apprenticeships, internships, and on the job training?

- What is the in-service/training plan for OVR Counselors making these determinations to ensure that individuals now eligible for services under WIOA requirements will be selected for supported employment services by OVR?
- When working with individuals with more significant impact of disability, the complexity of needs require a different view and approach that is provided in 'typical' supported employment services; what is OVR's plan to ensure that effective services are provided from the perspective of supporting individuals with complex needs?
- How will the criteria for eligibility for extended services be determined? While some information is given as to the process for extended services (pg 160), OVR must ensure that individuals with complex support needs are not excluded from eligibility for supported employment services because they may require extended support services.

Response: We appreciate the comment. OVR continues to identify and develop innovative strategies and supports for individuals with disabilities while we await the release of final regulations, guidance, and technical assistance on Section 511 Limitations on Use of Subminimum Wage.

- As a leader in this transition, we encourage OVR to serve as a strong resource to families by providing family training on employment options following high school, including alternatives to sheltered workshops. Developing a training plan for families would be further strengthened by partnership and commitment between the Department of Labor and Industry, Department of Human Services, and Pennsylvania Department of Education. The expectation that youth with significant disabilities can have an integrated, living-wage job in the community will be a challenge to culture and perception in some families, school districts, and communities. OVR and its partners will play a critical role in shifting employment of youth with the most significant disabilities from sheltered settings to community-based settings, as well as assuaging the concerns of families and providers throughout this transition. We encourage OVR to train Early Reach Coordinators and LEA points of contact in each office, and share widely with LEAS, the option for Discovery and Customized Employment for youth with the most significant impact of disability. Young adults with disabilities and their families are not familiar with this service as an option; sharing the model and successes of Discovery will increase awareness of the positive community employment opportunities for youth with significant disabilities. Additionally, PA CareerLink must shift to support the diversity of Pennsylvanians seeking work including individuals with significant disabilities; this includes providing accessible, relevant communications to job seekers. Providers of sheltered employment are partners in the effort to increase community-based employment for young adults with disabilities. These providers need support and funding to transition services away from segregated settings. We applaud OVR for their plans to use Innovation and Expansion projects to improve employment outcomes for people with the most significant disabilities; this will provide further opportunities for providers to be a positive force of change towards increased community employment (pg 156). We urge OVR to communicate widely with providers about the opportunities for these projects. In order for the proposed pre-employment transition services to be effective, service models must address the individual conditions for success of each student. Internships, work-based learning experiences and other work related opportunities must be designed to identify the specific skills (potential job tasks) a student can perform, strategies for teaching new skills, and conditions to be successful in the workplace. Traditional work-based learning experiences, based on acquiring a 'set' of 'job slots' to practice skills, has proven ineffective for individuals with significant impact of disability. OVR must address a plan with service providers to develop effective practice in

implementing these support services for students with significant impact of disability now eligible for services via the WIOA regulations.

Response: We appreciate the comment that a policy in favor of integrated employment for youth with significant disabilities may be a challenge to culture and perception of some school districts, communities and families. PDE would be pleased to work with DHS on developing a training strategy for school based IEP teams related to secondary and postsecondary work, including integrated employment and educational opportunities.

- The Arc of Pennsylvania supports and encourages OVR's endeavors to increase communication towards current and potential customers of OVR services (pg 111); we anticipate that all communication will be accessible to people with disabilities. We urge OVR to increase outreach efforts to the business community. Business and industry leaders must be informed about the workplace contributions which hiring individuals with significant disabilities can provide. Particularly with the changes in services due to WIOA, OVR's efforts to communicate with families, school districts, businesses, and providers is critical to achieving positive employment outcomes for youth with significant disabilities. The employment of individuals with significant impact of disability must also be a specific focus in community education and outreach efforts. This population has not traditionally been eligible for OVR's employment support services and perceptions about the employability of individuals with significant impact of disability can be a barrier to successful implementation of the requirements of WIOA. As part of its efforts to improve communications with customers, The Arc of Pennsylvania also urges OVR to limit the wait time of people referred to supported employment services (pg 119-120) to no more than 30 days. This will standardize and ideally minimize the time that customers are waiting for OVR eligibility determination. Additionally, each OVR customer should know their option to request a change of counselor.

Response: We appreciate the comment in support of the plan. OVR's Business Services and Outreach Division (BSOD) increases outreach efforts to the business community and provides singularity of focus and resources to better understand and respond to business needs in a dual customer service model (talent supply and demand sides). OVR is considered the lead state agency and preferred resource for businesses or organizations to recruit and on-board individual with disabilities (IWD) through a single point of contact (SPOC) model. OVR will increase alignment with Council of State Administrators of Vocational Rehabilitation (CSAVR) VR-National Employment Team (VR-NET) through Business Services Division agency- wide consistency in delivery of high quality business services utilizing emerging practices in an evolving, national VR community of practice. OVR's BSOD team is very active and engaged with the business community across the state. All District Offices have hired Business Service Representatives and they are active in community outreach and employer engagement through activities in local Society for Human Resource Managers chapters (SHRM) as well as Regional Chamber of Commerce meetings and events. We also continue to utilize the CSAVR National Outreach Contacts with employers and to encourage combined Bureau VRC's to register their consumer customers in the Talent Acquisition Portal (TAP) resume bank.

- We note that the state draft plan relies heavily on MOUs and interagency coordination between the Department of Labor and Industry, the Pennsylvania Department of Education, and the Department of Human Services. We applaud the measures being taken to create and update connections and coordination between the departments. The Arc of Pennsylvania anticipates

that all agreements and MOUs between the departments will be substantial, functionally implemented, and will carry consequences for non-compliance.

Response: The commonwealth appreciates the comment and recognizes the importance of meaningful accountability provisions in interagency MOUs.

Stefani Pashman and Mark Latterner of the **Three Rivers Workforce Investment Board** offered multiple comments to include:

- The Three Rivers Workforce Investment Board (3RWIB) strongly supports the Governor’s vision and goals outlined in the Pennsylvania WIOA Combined State Plan, including developing viable career pathways, expanding training opportunities, improving data sharing and integration, strengthening collaboration across agencies and sectors, and building a stronger workforce development system that works for both job seekers and employers. 3RWIB will work together with our local and regional partners to achieve the Governor’s objectives and offers suggestions below to strengthen the system’s ability to respond to the needs of businesses and job seekers. 3RWIB appreciates the opportunity to review and provide input on the combined state plan. In support of this process, we also offer to provide a local perspective on program implementation, participate in focus groups, or actively pilot and evaluate new initiatives proposed by the Governor to help create evidence that practices work. With respect, 3RWIB submits the following comments and recommendations:

Response: We appreciate the comment in support of the Governor's vision and goals.

- **Data Integration and Accessibility:** 3RWIB is encouraged by efforts discussed in the state plan to build a greater level of integration between the Commonwealth Workforce Development System (CWDS) and other case management and data collection systems across programs. This integration is necessary to improve the coordination of services for individuals throughout programs and understand the effectiveness of multiple interventions. Opportunities remain to strengthen the Commonwealth’s plan for improving the coordination and use of data across systems: 1. **Local Data Access:** In a system driven on accountability, local areas need real time data to ensure that programs are being run effectively, services are not duplicated across programs, and that public funds are being spent with an eye toward the return on investment. 3RWIB is encouraged to see the Departments linking data to ensure validity. There are additional opportunities in which the Commonwealth could support local areas in achieving goals by enabling local areas to access (when possible) data from specific state systems. 3RWIB recommends the following: a. To support local areas in their effort to serve individuals with the greatest barriers to employment, the Commonwealth should allow local areas access to data from the state’s COMPASS system. This access would enable PA CareerLink® staff to streamline the process for determining WIOA eligibility by reducing paperwork requirements and allowing for verification of eligibility on-site. For example, youth program staff currently estimate up to 25 percent of staff time is spent determining eligibility when processing youth applications. Access to COMPASS data would also enable more targeted outreach to populations with barriers to employment. Furthermore, COMPASS data would provide staff with a better understanding of the services currently being accessed by participants, enabling staff to more effectively provide referrals. By enabling staff to assess the variety of services being accessed by individuals, these data would also increase understanding of the combinations of human and workforce development services that work best when serving clients.

Response: DHS is exploring the possibility of sharing information between COMPASS and the PA CareerLink® system. This is a part of a multi-faceted project we are working on within DHS. Our goal is increase data sharing so recipients can access more services in an efficient manner.

- The combined plan discusses that Unemployment Insurance Wage Records will be merged with participant data from all core partners and access to the quarterly UI wage records will be granted within the constraints of PA regulations for program evaluation purposes (page 66). 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.

Response: Access to quarterly UI wage records for the purposes of program evaluation will be granted within the constraints governing confidentiality of claimant unemployment insurance and personally identifiable information.

- Workforce Development Quality Initiative (WDQI): The combined state plan discusses the PAWDQI, an initiative to link data from the workforce development and education programs in Pennsylvania that use different systems of record (page 55). To build upon the commitment of the Commonwealth to implement the PA-WDQI and increase data-driven decision making at the local level, the following steps are recommended:
 - Where possible, use of wage record data should be implemented to understand outcomes of all programs included in the combined state plan. As mentioned, this data would strengthen understanding of the effectiveness of shared efforts across programs in serving individuals with barriers to employment by allowing more real-time analysis of program impact.
 - The Commonwealth should establish a clear timeline within the state plan for implementation of the PA-WDQI, including setting firm targets and goals for the initiative. It is not clear within the current plan when LWDBs should expect the PA-WDQI to be implemented or how LWDBS can contribute to or benefit from the system.

Response: Wage record data will be used to produce program outcomes where applicable and practical. A clearer timeline for WDQI will be established once commitments from additional partners are received.

- Balancing the Needs of both Job Seekers and Employers: 3RWIB commends the Governor for the vision of serving populations most in need of workforce development services through the public system. 3RWIB also recognizes the significant value of training to help job seekers gain the skills and credentials in demand by employers, enabling them to enter employment opportunities along viable career pathways. However, some strategies and requirements within the state plan may create challenges in effectively meeting the needs of both job seekers and employers:

Response: We appreciate the comment.

- **Training Benchmarks:** The combined state plan includes benchmarks set by the Commonwealth for how much WIOA Title I funding must be used for training, as well as the percentage of these training funds that must be spent on individuals with barriers to employment (page 10). 3RWIB will strive to meet these targets. In setting training benchmarks, however, it is recommended that the following be considered:
 - 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 follow up are both time and cost intensive and vital to the success of youth participants.
 - 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. In Pittsburgh and Allegheny County, Dislocated Workers that did not participate in training had a job placement rate of 91% and average wages of \$17.21, just under the 92% rate and \$17.81 average wages for Dislocated Workers that participated in training.
 - The Commonwealth's definition of training expenses should be broad and include all staff expenses directly related to providing training services as defined in Section 134(c)(3) of WIOA.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- **Priority of Service:** The combined state plan sets a target for 70 percent of job seekers served through local PA CareerLink centers to be individuals with priority of service (page 68). 3RWIB applauds the Governor for his emphasis on serving individuals with barriers to employment. To support LWDBs in meeting this goal and to prevent any unintended consequences, such as a slower response to employer needs, it is recommended that the following be considered:
 - The Commonwealth should support LWDBs in meeting this priority of service target by providing local areas with access to additional state data systems, including COMPASS data. These data would streamline the process for determining eligibility for priority of service by reducing paperwork and enabling onsite verification. These data would also support local outreach efforts to individuals with priority of service.
 - WIOA does not require priority of service for dislocated worker populations. In order to best serve local businesses, the Commonwealth should exclude dislocated workers from priority of service calculations.
 - The Commonwealth should take this priority of service target into account when setting performance levels, including for the measure "Effectiveness in Serving Employers." Setting a high benchmark for serving priority of service individuals presents a challenge when also meeting the needs of employers. Populations with priority of service often require supportive and more intensive services, extending the length of their program participation. This in turn lengthens the time required to serve employers.

Response: We appreciate the comment and agree that the 70% requirement should only apply to the WIOA Adult and Youth funding streams and will make that clear in the state plan. We will also take into consideration the additional recommendations.

- **Additional Burden upon Employers:** 3RWIB supports the Governor’s goal to expand training opportunities, including work-based training, to better serve job seekers. 3RWIB also supports the Governor’s goal of strengthening efforts to engage employers with the public workforce development system. However, requirements within the combined state plan may increase the burden and challenge the participation of employers. The following is a key example that should be considered:
 - Workforce System Policy No. 04-2015, referenced in the combined state plan (page 82) creates a new requirement for work-based training providers to be placed on a Local Training Provider List (LPTL) to provide training services. Employers must provide a variety of program information, including program performance, to be considered for the LPTL. WIOA did not include this requirement and the State plan should remain consistent with WIOA to maximize opportunities for employer engagement. Additional administrative burdens will increase the time and effort required by employers to complete a training contract, creating an additional obstacle to employer engagement.

Response: Although WIOA does not require the collection of performance information from training providers (regarding their associated programs) exempted from the statewide ETPL (i.e., work-based training programs), the Governor has determined such a list be developed, maintained and disseminated. This enhancement will ensure accountability of training providers at the local level; the quality in the training programs offered throughout Pennsylvania; assessment of the return on investment of WIOA title I-B training funds; and the facilitation of customer choice. Additionally, the commonwealth does not intend, nor does it anticipate, any additional burden on the employer beyond what is federally mandated for reporting.

- **Focusing on “High Quality Jobs”:** In the combined state plan, the Commonwealth “will require LWDBs to prioritize funds to be used for business services activities, on-the-job training and incumbent worker training to those employers offering high quality jobs” (page 16). To support the Governor’s goal of developing viable career pathways, it is also important to consider the value of positions offering an entrance to career pathways leading to higher quality jobs. 3RWIB recommends that “high quality jobs” continues to allow for engagement with employers offering entry-level positions along career pathways, consistent with WIOA. These positions are crucial to providing WIOA participants, particularly individuals with priority of service, with an opportunity to initially enter a career pathway that offers opportunities for advancement into “high quality jobs”.

Response: We appreciate the comment and note that we include language, for example, in Goal 4.1 allowing for jobs that are likely to lead to high-quality jobs.

- **Coordination across Partners and Programs:** 3RWIB supports the purpose of a combined state plan that outlines the strategy, vision, and goals for workforce development across all core and partner programs. The Commonwealth’s combined plan could be strengthened by providing greater discussion on how programs and partners will truly work together to achieve the Governor’s goals. It is recommended that the combined state plan include more specific

language and detail that ensure all partners and programs work together and are accountable for meeting the Governor's goals. The following are examples:

- WIOA emphasizes equal accountability across all core programs. Performance in WIOA will be measured on both a program-specific (through a set of common measures for all programs) and system-wide basis (how well programs achieve collective outcomes). A systemic performance measure should be set in the combined state plan to ensure all programs are held accountable together in meeting performance goals.
- The combined plan should include specific language and mutual requirements for how programs will coordinate to ensure appropriate referrals between WIOA Titles to reduce duplication of services and meet the variety of participant needs.
- 3RWIB recognizes the value of co-enrollment to more effectively meet the multiple service needs of individuals. The combined state plan should set clear expectations and mutual requirements for how programs will work together to identify ideal candidates for co-enrollment.
- 3RWIB is encouraged by the Commonwealth's plan to enhance agency coordination in providing business services (page 16). However, the combined plan would benefit from greater detail on how this enhanced coordination would work. More importantly, having a clear set of expectations and mutual requirements for each partner and program would facilitate collaboration among partners. This coordination is necessary to improve efficiency and reduce the duplication of work in employer engagement.

Response: We appreciate the recommendations and will discuss them with the interagency team referenced in the State Plan. We also note that we will consider plan modifications as additional policies and procedures are developed around program coordination.

Chris Snyder of the **UFCW Local 1776 Northeast & Central Divisions** offered multiple comments to include:

- **Training Expenditures:** While there is certainly value to upskilling the commonwealth's workforce by increasing the number of individuals earning college degrees and industry-recognized credentials, the workforce system is much more than training, and a look at the bigger picture is warranted. Diverting a fixed percentage of already limited WIOA Title I funds to training could negatively impact the delivery of valuable career and business services in my area. In addition to possible reductions in program staff, including case workers and career coaches who support the placement of individuals in training, such cuts could result in reductions in services or even the downsizing or closure of some PA CareerLinks® in the commonwealth. The establishment of benchmarks based on a percentage of a local workforce area's federal allocations ignores the many other valuable services the local workforce system provides to businesses as well as job seekers that contribute to the regional economy.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- **Priority of Service Benchmarks:** Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to

develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- PA CareerLink® centers serve as the storefront for the delivery of services to businesses and job seekers in the commonwealth. Increasing the quantity and quality of online, self-service options both inside and outside of PA CareerLinks® is of value in today's increasingly tech savvy society. However, the reality is that some of the hardest to serve customers do not have strong technology skills or access to computers or the internet. Further, there are still areas of the state, both rural and urban, that do not yet have broadband available. Online services cannot replace face-to-face career coaching and mentoring as well as the many other hands-on training and other programs delivered at PA CareerLink® centers that lead to employment success and add value to our communities.

Response: We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

Congressman Glenn 'GT' Thompson of the **US House of Representatives** offered multiple comments to include:

- I write to provide input on the Pennsylvania's Workforce Investment and Opportunity Act Combined State Plan draft that was released to the public for review and comment. As a member of the House Education and Workforce Committee, I was honored to play a part in moving WIOA through the legislative process and to the President's desk, where it was signed into law on July 22, 2014. This long overdue bipartisan reauthorization of the Workforce Investment Act (WIA) aims to reshape the nation's approach to job training, and bring the law into alignment with the needs of our advancing economy. The intent of this legislation is to deliver more comprehensive services to workers, job seekers, and employers. Additionally, WIOA takes steps to improve performance accountability and transparency, with the hope of growing consumer confidence in training services. Since first being elected to Congress in 2008, I have represented Pennsylvania's largest congressional district which includes approximately 24 percent of the commonwealth. My district, and Pennsylvania as a whole, consists of diverse regions that come with unique sets of needs. Therefore, as you move forward with the process of issuing state-specific guidance on the provisions of WIOA, I ask that you focus on encouraging local flexibility based on local needs as Congress intended. Following the release of the combined state plan draft, I received feedback from stakeholders in my district who will be on the front lines of supporting the Governor's proposed goals and objectives, including members of local workforce development boards, the PA Workforce Development Association (PWDA), and the County Commissioners Association of PA. While leaders within these organizations are eager to play a key role in improving the quality and structure of Pennsylvania's approach to job training, they have outlined some areas of concern within the state draft plan.

Response: We appreciate the comment and note that the State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved.

- One of the most significant concerns shared by the aforementioned stakeholders are the WIOA Title I funding benchmarks that require a certain amount of Title I funding to be used for training each year. In Program Year (PY) 2016, at least 30 percent of Title I funding must be directed towards training, of which 50 percent must be spent on low income individuals and individuals with other barriers to employment. By 2018 and every year after, the standard is raised to 50 percent and 70 percent respectively. While the importance of assisting low income individuals and individuals with other barriers to employment is undeniable, this benchmark system has the potential to result in unintended consequences, especially in rural areas. Specifically, these expenditure requirements may result in the closing of offices which provide important employment services, increasing travel time for customers and limiting access to valuable resources. Furthermore, these across-the-board spending targets create a "one-size-fits-all" approach that disregards local demographics, challenges, and economic conditions. It may be beneficial to this process to highlight the specific provisions of WIOA which underline Congress's intent to clearly assign roles to states and local workforce development boards. Section 101(d)(12) of WIOA outlines the responsibilities of the state board, which include developing policies to promote statewide objectives and improving the performance of the state workforce development system. Additionally, pursuant to Section 107(d) of WIOA, local elected officials, in conjunction with local boards, should be charged with setting policies, approving budgetary line items, and determining financial priorities based on local conditions. I firmly believe that regional and local autonomy will be a key factor to the success of this landmark legislation. Thank you for your comprehensive approach to improving the experiences of residents, employers and consumers within the state of Pennsylvania. I am confident that we can work together to improve the commonwealth's workforce strategy over the next four years. I respectfully request that you take this submission as well as those of key stakeholders across the state into consideration as you prepare to release the final version of Pennsylvania's Workforce and Investment and Opportunity Act Combined State Plan.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

James Decker of the **Warren County Chamber of Business & Industry** offered multiple comments to include:

- Priority of Service Benchmarks (p. 68: State will monitor data reported to determine the percentage of those served who are individuals with priority of service and barriers to employment)

Federal law clearly prioritizes services to those with barriers to employment, including individuals with low incomes and those with basic skills deficiencies and other obstacles. However, the establishment of an arbitrary threshold of 70% of individuals served is an unnecessary intrusion on the ability of local elected officials and their boards to develop local budgets and determine funding priorities. Local boards should retain flexibility to address the needs in their communities while giving priority to those with barriers as the law requires. This

will have a significant impact on the local area's ability to meet the critical needs of dislocated workers from Joy Mining, General Electric Transportation Services (GETS), and other employers that are experiencing reductions in the workforce.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- Transitional Jobs (p. 70: Local Workforce Development Boards will be required to use between 5-10% of Title 1 funds to provide transitional jobs and ensure that priority of service for transitional jobs is afforded to individuals who qualify)

NW PA WDB applied and received funding from the Workforce Innovation Fund (WIF) federal grant program to target the population described in this section of the State plan as priority of service. The requirement to spend Title 1 funds for this group will negatively impact the ability of staff to meet the goals of the federal program. Flexibility in the state plan for the local board to determine how or what funds are used to meet the requirements is advised. Additionally, the need to get approval from the commonwealth to transfer funds from Title 1-B funds from Adult to the Dislocated Worker Program will negatively impact our ability to be responsive to the needs of dislocated workers in the area such as GETS and Joy Mining.

Response: Transitional job opportunities are an important priority for the Governor. The commonwealth received a number of comments in support of the requirement to fund transitional jobs. Regarding transfer of Title I funds, the commonwealth will review requests to transfer funds as quickly as possible to ensure service delivery is not disrupted.

- Employer Services (p. 24-25) (p.67) and throughout the plan

A definition of High Quality Jobs is necessary to determine the focus of employer services. Recognizing that many of the openings are low end and replacement for turnover and not going deeper into the data is a concern. There are many job seekers that do not have the skills for a higher level position and employers that need to fill these positions in order to vet a new employee that may move up a career pathway/ladder. Also this is cause for concern in prioritizing employers for services that they are begging to have.

The plan, in general, does not cover many employer services. The focus is on the funding which follows the job seeker and is targeted (70%) to those with barriers to employment and prioritizes three areas 1) recipients of public assistance 2) other low income individuals and 3) individuals who are basic skills deficient.

Response: We appreciate the comment and recognize some subjectiveness in the term "high-quality jobs," although the plan outlines characteristics of high quality jobs (reasonable wages, benefits, full-time stable employment, advancement opportunities, etc.) in the introductory language under Goal 4. While the State Plan emphasizes and encourages high-quality jobs it also provides flexibility for hardest to serve populations by allowing for jobs that are likely to lead to high-quality jobs. We also agree with the commenter that the workforce development system can only be successful if it is responsive to the needs of employers. Goal 2 focuses on developing

a pipeline of workers to meet industry needs and Goal 4 speaks to engaging employers and being responsive to their needs.

- Data Collection (p. 18 comments 5.1 through 5.7) ROI & Market Penetration (p. 32 table)

While we recognize the importance to protecting data, as a local partner the WDB will need to utilize the information to make local decisions that are not necessarily interesting to the commonwealth. The state plan does not clarify what access the local board will have to the data. In addition the definition for ROI and Market Penetration are not clear. If employers are not eligible because they do not qualify for services due to high turnover or low wages (p. 29) it will be impossible to meet the imposed requirements. We encourage the commonwealth to share the raw data with the local areas so that improvements in the system can be made.

Response: The commonwealth must ensure the integrity and security of data among all partners and programs. As the volume and diversity of workforce data grows, so too do the opportunities and challenges of sharing information among all involved. We are committed to expanding access within the parameters outlined by statutes, regulations, and policies that govern the release of this data. Additional clarity for the ROI and market penetration measures will be provided once final WIOA regulations are released.

- High Priority Occupations (HPO) List and High Turnover Positions (p. 24-25)

It is admirable that the commonwealth wants to reduce the high turnover rates and focus on retention, but without a change in the method for developing the HPO list it will be nearly impossible. Given the principle of consumer choice used at the PA CareerLinks® it is unlikely that we will experience a reduction in the number of individuals requesting training that is on the HPO list to focus on positions where the turnover is low.

Response: The process of identifying statewide and regional HPOs is evaluated each year for effectiveness and responsiveness. We welcome suggestions and recommendations. Recent modifications based on feedback include the introduction of career pathways as a petition option and an increased length of time occupations can remain on the list when successfully petitioned.

- Workforce Development System-Alignment Strategy (p. 29)

This is an area that can be improved in the PA CareerLinks® and I am pleased to see that the commonwealth recognizes the need. Each partner in the PA CareerLinks® should be willing to serve each client that enters and share the information with all professionals employed in the site.

Response: We appreciate the comment in support of this effort.

Joan Stitzinger of the **Warren Forest Higher Education Council** offered multiple comments to include:

- The plan does not recognize the Community Education Councils of Pennsylvania and the work they do within the rural areas of the Commonwealth to make education and training available where no education/training services exist. The CECs have been in existence for over 35 years

and are an integral part of their rural communities with funding provided through PDE. As such, Recommended insertion into the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan:

- Page 39-44 Alignment with Other Partner Programs: The Community Education Councils network (CECs) as designated by PDE will align training development efforts with the overarching strategies of the Commonwealth to increase the education and training delivery to residents of rural communities.
- Page 51-53 Leveraging Resources to Increase Educational Access: The Community Education Council network (CECs) as designated by PDE have historically leveraged other state and local funding to implement sector based training provided through a variety of educational institutions in rural communities where campus locations are non-existent. CECs serve as an intermediary and broker of education and training programs based on identified need and demand.
- Page 53 under the heading Improving Access to Postsecondary Credentials: The Community Education Council network (CECs) as designated by PDE will extend program development activities with postsecondary institutions to ensure that residents of rural communities have access to credential bearing education and training opportunities.

Response: We agree that the Community Education Councils are important partners and have included them in the final State Plan on page 40, 51 and 53.

Mary Stiller of the **Washington County Chamber of Commerce** commented: The chamber strongly believes the local elected officials, and their boards, are in the best position to understand the needs of their communities and how to best meet those needs. We support giving local officials the flexibility to develop local budgets and determine program funding levels, while giving priority to those with barriers to employment, as the law requires.

We support increasing the quantity and quality of online, self-service options to business and job seekers in the Commonwealth. However, it is important to recognize that there are some areas in the state, including Washington County, that do not have access to broad band services. In addition, there is a population of jobseekers that do not have strong technology skills or access to computers. In many cases, online services would not have the same employment success rate as face-to-face career coaching, hands-on training and mentoring. The chamber supports retaining physical locations and in-person programming to successfully service the needs of all Pennsylvanians.

We respectfully submit these comments for your consideration.

Response: We appreciate the comment and note that the State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved. We recognize that some individuals will not be best served using technology and that some areas of the state lack broadband. As such, the State Plan does not seek to replace in-person services, but simply seeks to enhance online and technological solutions to better reach and serve those individuals that do have access to technology.

Lucyann Vierling of the **Wayne Pike Workforce Alliance** offered multiple comments to include:

- As designated by the Pennsylvania Department of Education, Community Education Councils (CECs) provide educational access to more than 1 million residents in a geographic region encompassing 31% of land mass in the Commonwealth.

CECs are an aligned, collaborative partner that strategically shares the workforce development goals of the Commonwealth. The inclusion of CEC partner activities within the Combined State Plan demonstrates another cohesive attribute the Commonwealth provides to ensure the attainment of said goals.

Recommended Insert (s) into the Workforce Innovation and Opportunity Act (WIOA) Combined State Plan:

- Page 39-44 Alignment with Other Partner Programs: The Community Education Councils network (CECs) as designated by PDE will align training development efforts with the overarching strategies of the Commonwealth to increase the education and training delivery to residents of rural communities.
- Page 51-53 Leveraging Resources to Increase Educational Access: The Community Education Council network (CECs) as designated by PDE have historically leveraged other state and local funding to implement sector based training provided through a variety of educational institutions in rural communities where campus locations are non-existent. CECs serve as an intermediary and broker of training programs based on identified need and demand.
- Page 53 under the heading Improving Access to Postsecondary Credentials: The Community Education Council network (CECs) as designated by PDE will extend program development activities with postsecondary institutions to ensure that residents of rural communities have access to credential bearing training opportunities.

Response: We agree that the Community Education Councils are important partners and have included them in the final State Plan on page 40, 51 and 53.

Debra Donahue of the **West Central Job Partnership** offered multiple comments to include:

- Training Benchmarks: WIOA places a much greater emphasis on serving individuals with significant barriers to employment (educational barriers, Basic Skills Deficient, low income, etc.). It is imperative that those barriers are eliminated before individuals are successful in training. Before arbitrary percentages are required to be spent on direct training, some baseline needs to be established to determine the need for “pre-training” assistance to eliminate barriers prior to moving individuals forward to training services.

The current method of collecting data to calculate the percentage of monies spent on direct training only includes Title I dollars and does capture money spent on training from Rapid Response, Trade, OJT NEG, TANF, other federal dollars, etc. For example-NEG OJT grant monies could only be spent on training, so all long-term OJTs were written under this grant and other WIA dollars were utilized to cover rent, staff costs, etc.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets.

- It is not clear if the local and regional performance rates are going to be one and the same. Local economic conditions may vary within a region due to uneven growth, therefore, performance rates should be negotiated locally and not for the region as a whole.

Response: Section 677.20 of the Notice of Proposed Rulemaking states that each local area in the region will establish performance levels through a negotiation process prior to the start of the program year.

- Currently, attainment of a credential equates to earning a high school diploma, GED, Associate or Bachelor degree. Credential has yet to be defined, but should include industry-recognized certificates of completion and credentials such as Manufacturing Skill Standards Council's (MSSC) Certified Production Technician (CPT), American Welding Society (AWS) welding certificates, and others.

Response: We appreciate the comment and note that we await the publishing of final WIOA regulations in terms of defining credentials.

Multiple employees from the **Westmoreland County Blind Association** offered comments to include:

- My name is Brandon sheets. I work at Westmoreland county blind association, which is an organization that is an affirmative employer of people with disabilities. My work is important because I like the work that I do here. I choose to work here because I fit in and people respect me. If I didn't have this choice, I would be upset. Please allow me to have a choice.
- My name is Carol Yusko. I work at the Westmoreland County Blind Association located in Greensburg, pa. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I see my friends. I choose to work here because I feel safe here. If I didn't have this choice I would have to stay at home.
- My name is Rocco Salcciccioli. I work at the Westmoreland County Blind Association located in Greensburg, Pa. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I box up paper, and work with my friends. I choose to work here because I like it better. If I didn't have this choice I would get a new job.
- My name is Jack Shomo. I work at Westmoreland County Blind Association located in Greensburg, Pa. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because pulling paper making money. I choose to work here because I like it, my friends are here. If I didn't have this choice I don't know.
- My name is Matt Butler. I work at the Westmoreland County Blind Association located in Greensburg, Pa. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because it gives me something to do. I choose to work here because it' easy going here. If I didn't have this choice I would just sit at home all day.

- My name is Christy Ciarriomboli. I work at the Westmoreland County Blind Association located in Greensburg, Pa 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I like to pull paper with my friends. I choose to work here because this is the only job I can have. If I didn't have this choice I would stay home.
- My name is Mark Quist. I work at the Westmoreland County Blind Association located in Greensburg, Pa. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I destroy documents and papers. I choose to work here because there are more people here to help me if I have a seizure, and it makes me feel safe. If I didn't have this choice, I would I really don't know, I couldn't say.
- My name is Mike Kissel. I work at the Westmoreland County Blind Association located in Greensburg, Pa 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I like it here. I choose to work here because it is educational. If I didn't have this choice, I would just stay home.
- My name is Ricki Leone. I work at The Westmoreland County Blind Association located in Greensburg, Pa. This is an organization that is an affirmative employer of people with disabilities. My work is important because I learn life skills I can use everyday. I choose to work here because I a comfortable here. I love my staff and friends that I can relate too. I have tried working at McDonald's before and it didn't work.
- My name is Desiree Miller. I work at The Westmoreland County Blind Association located in Greensburg, Pa. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I see my friends and we have parties. I choose to work here because I have friends and the staff helps me. If I didn't have this choice, I would be very sad.
- My name is Calvin Wigfield. I work at The Westmoreland County Blind Association located in Greensburg, Pa. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I meet new people. I choose to work here because I like shredding and doing all the jobs here. If I didn't have this choice, I would try to find another job shredding.
- My name is Teresa Bolam. I work at The Westmoreland County Blind Association located in Greensburg, Pa. 105601. This is an organization that is an affirmative employer of people with disabilities. My work is important because it keeps me busy. I choose to work here because I like it here. If I didn't have this choice, I would I just don't know.
- My name is Shawn Stape. I work at the Westmoreland County Blind Association located in Greensburg, Pa 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because it pays good. I choose to work here because all of the people here, I like them. If I didn't have this choice, I would just stay home.
- My name is Justin Geier. I work at the Westmoreland County Blind Association located in Greensburg, Pa.15601. This is an organization that is an affirmative employer of people with

disabilities. My work is important because it gets me out of the house. I choose to work here because I feel safe, and enjoy the people. If I didn't have this choice, I would really not know what I would do.

- My name is Autumn Self. I work at the Westmoreland County Blind Association located in Greensburg, PA. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I love to make friends. I choose to work here because I love the people here, It's a fun place, and I feel safe here. If I didn't have this choice I would try to get a job from home, working over the phone or something.
- My name is Bret Gulisek. I work at the Westmoreland County Blind Association located in Greensburg, Pa. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because it keeps me busy and I have a lot of friends here. I choose to work here because I get to meet new people and get to do many different jobs to do. If I didn't have this choice, I would probably stay home. I tried the ARC, RCW, Paula Teachers, and I like it here. I don't feel like an outcast, there is no abuse here. I feel safe.
- My name is Kristine Bastl. I work at The Westmoreland County Blind Association located in Greensburg, PA. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because my friends are all here. I choose to work here because I like it here. If I didn't have this choice I would have to get another job.
- My name is George Norcera. I work at the Westmoreland County Blind Association located in Greensburg, PA. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because all my friends are here. I choose to work here because it's fun, my friends are, and to make money. If I didn't have this choice, I would find another job.
- My name is Alex Morrison. I work at The Westmoreland County Blind Association, located in Greensburg, Pa. 15601. This organization that is an affirmative employer of people with disabilities. My work is important because I like the people here. I choose to work here because All my friends are here. If I didn't have this choice, I would probably just stay home.
- My name is Carol Pilch. I work at the Westmoreland County Blind Association located in Greensburg PA 15601. This is an organization that is an affirmative employer of people with disabilities. This is a home environment for the people who choose our facility. It is a comfort zone for them and they build their confidence in knowing their job. It is very consistent for them. If they should be put out into the mainstream it would be very overwhelming and different everyday. They need consistency!!
- My name is Cindy Morrow. I work at the Westmoreland County Blind Association located in Greensburg, PA. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I like to make money. I choose to work here because I think this is a good place to work and I'm comfortable with my setting. If I didn't have this choice, I would be out of a job.

- My name is Sharon Goodlin. I work at the Westmoreland County Blind Association located in Greensburg, PA. 15601. This is an organization that is an affirmative employer of people of disabilities. My work is important because I need to make money to go out with friends. I choose to work here because all my friends are here and I enjoy what I do. If I didn't have this choice, I would be bored at home and would want to move closer to my family.
- My name is George Kozar. I work at The Westmoreland County Blind Association located in Greensburg, Pa. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because of my friends and it's good work. I choose to work here because I just like it here. If I didn't have this choice, I would go to the arc.
- My name is Steven Fekete. I work at the Westmoreland County Blind Association located in Greensburg, Pa. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I like being with friends. I choose to work here because I make more money. If I didn't have this choice, I would get a job at RCW.
- My name is Mike Daley I work at The Westmoreland County Blind association located in Greensburg, Pa 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because it gives me fulfillment, and we prepare documents to be destroyed, and eventually they get destroyed. I choose to work here because I have friends and I can do the work. If I didn't have this choice, I would, at my age probably retire.
- My name is Raymond Kargle. I work at the Westmoreland County Blind Association located in Greensburg, PA 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because we help the military. I choose to work here because you treat me better than the other places. If I didn't have this choice, I would retire.
- My name is Stephon Short. I work at the Westmoreland County Blind Association located in Greensburg, PA 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I like the work. I choose to work here because my team wanted me here. If I didn't have this choice, I would try to get a job at another workshop.
- My name is Georgeanne Malesky. I work at the Westmoreland County Blind Association located in Greensburg, PA. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I like working here. I choose to work here because I make other friends. If I didn't have this choice I would be sad.
- My name is Terry McCafferty. I work at the Westmoreland County Blind Association located in Greensburg, PA. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because of the pay. I choose to work here because of the staff. If I didn't have this choice, I would have to find a job with another workshop.
- My name is Erica Panichella. I work at the Westmoreland County Blind Association located in Greensburg, PA. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I like working here. I choose to work here because the people are friendly. If I didn't have this choice, I would feel sad and mad.

- My name is DeAnn Wallbaum and I work for The Westmoreland County Blind Association located in Greensburg, Pa. 15601. This is an organization that is an affirmative employer of people with disabilities. I have been on both sides of this debate. Pre-voc versus Employment at various places earning minimum wage. I was a manager for 20 years at a fast food restaurant in which we employed various people with various disabilities. They had job coaches that would come with them and show them how to perform their jobs. For some they loved it for others they had a hard time with the demands of the job and would often times display inappropriate behavior which would eventually cause them to have to be replaced. When I came here to work in a pre-voc atmosphere I could not believe how much a program like this helped individuals with disabilities become more independent. The structure of this pre-voc is designed for each individuals needs versus being in a minimum wage job which no matter what the individual disability is everyone is classified the same. When in reality no 2 individuals are the same with disabilities. There will be a lot of clients here that will be distraught if they had no pre-voc to attend. There would be so many of them that will not be able to function in society at a minimum wage job. So they will be left only to stay home and all their sense of independence will disappear. Why would we want to take that away from them!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!
- My name is Donna Opsitnick. I work at the Westmorland Blind Association located I Greensburg, Pa 15601. This is an organization that is an affirmative employer of people with disabilities. I feel that this organization should remain open for the fact that a lot of these people would not have any structure in their lives if it is closed. Many people depend on the facility for socialization and just getting away for the day to work in a group environment. They love it here just as we love having them come on a daily basis. So please let's keep it gone for the sake of these people. Where would they be if facilities like this are not available.
- My name is Rebecca Labuda. I work at the Westmoreland County Blind Association located in Greensburg, PA 15601. This is an organization that is an affirmative employer of people with disabilities. Without the workshop, I believe there would be limited choices on where these individuals could work. Those with limited communication skills and intellectual disabilities, need supervision that could not be found with competitive employment. Hopefully there is much reconsideration on such a change that would affect many.
- My name is Raymond Smith. I am employed by the Westmoreland County Blind Association located in Greensburg, PA 15601. WCBA is a Pennsylvania non-profit organization that is a committed affirmative employer of people with disabilities. I offer personal testimony to the care and compassion we provide in addressing the needs of those who are afflicted with physical and mental challenges. It is each individual's obligation to be "a voice" for those who otherwise have none. Due diligence and great thoughtfulness, must precede any actions that could manifest itself into a life changing event for those who depend on us. I ask for your kind and thoughtful consideration in attending to the positive needs of our clientele.
- My name is Patricia Leasure. I work at The Westmoreland County Blind Association located in Greensburg, Pa. 15601. This is an organization that is an affirmative employer of people with disabilities. My work is important because I can make a difference to my company. It give me the opportunity to do many jobs in which I otherwise would not be able to do! If I didn't have this choice I would not be able to just run out anywhere and get a job.

- My name is Dawn Lynn, & I work at Westmoreland County Blind Association located in Greensburg, PA. This is an organization that is an affirmative employer of people with disabilities. I feel that this facility should remain open for the people and children here, so they have structure, guidance and a place where they can remain active! The people and children look forward to coming here everyday, and working with others. So, please find it in your heart (and budget) to keep these places open! Thank you so much for your time, help, and consideration with this matter.

Response: We appreciate the commenter's sentiments. New requirements in WIOA and from the federal Centers for Medicare and Medicaid Services are requiring states to offer more resources to people with significant disabilities to become employed in a competitive integrated job. CMS rules in particular are implementing funding rules that, after March 2017, will no longer allow federal waiver funds to service individuals in settings that segregate and isolate. We cannot say at this time whether these federal changes will adversely impact these individuals' current situations.

Patrick Gerity of **Westmoreland Country Community College** offered multiple comments to include:

- Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006:
 1. Recommend that the Commonwealth separate Perkins from the state's combined WIOA plan as follows:
 - The benefits of combining Perkins grant funds with the state WIOA plan is unclear.
 - The inclusion of Perkins with the WIOA plan will impose an additional bureaucratic structure with an increase of paperwork and reporting requirements, while at the same time decreasing the amount of funds available to the training providers because the WIBs will add their administrative costs.
 - There is already more demand for Perkins services than the existing appropriation can support, so diverting even a small percentage to WIOA bureaucratic overhead denies students and clients of the necessary and essential support services.
 - The current administrative structure of Perkins at PDE is effective and efficient
 - The Perkins grant legislation is currently being considered for reauthorization in the U.S. Congress. Including Perkins in the WIOA plan may delay reauthorization even further and make it more difficult to comply when reauthorization is finalized.
 - Community colleges have a strong working relationship with PDE relative to the administration of Perkins funds. It is already a requirement in current Perkins legislation to include at least one representative from your local WIB on the mandated Perkins Participatory Planning Committee (PPC).

Response: PDE agrees that including Perkins as a Program Partner in a WIOA Combined Plan could result in additional requirements for Perkins recipients especially without additional guidance from USDOL and USDE. PDE will be revising the Perkins Local Plan to include additional requirements of the Perkins recipients. As noted, the Perkins recipients will have to document and assure compliance. Reauthorization of the Perkins Act has not yet occurred and continues to be the subject of political negotiation. PDE also notes that community colleges have working relationship with WDBs in addition to PDE. The federal Perkins regulations mandate the current performance measurement indicators and are not able to be changed until Perkins is reauthorized. Perkins regulation did allow for local negotiations.

- Do KEYS staff have any suggestions (see bottom of page 39, top of page 40, middle of page 53)
 - Including KEYS with the WIOA state plan will impose an additional bureaucratic layer and increase paperwork and reporting requirements, while at the same time decreasing the amount of funds available to the training providers because the WIBs will add their administrative costs..
 - The current administrative structure of the statewide KEYS Program is effective and efficient.
 - The Keys Program bill has recently been established as state law making KEYS a statutorily mandated program. It was folded into the Welfare code amendment bill that supplemented the budget. We have heard that implementation may include expansion of the program to state universities as well as career and technical schools. During a statewide KEYS Program conference call this morning, we were told that the Statewide allocation for KEYS will be level-funding for next fiscal year. The aftermath of this recent legislation coupled with the WIB possibly receiving administrative costs from KEYS would certainly be detrimental to the established KEYS Programs at PA's community colleges. The existing statewide funding allocation would be spread throughout additional agencies decreasing the amount of funds available to PA community colleges.

Response: The inclusion of KEYS in the WIOA Combined State plan will not alter the current fiscal or programmatic policies and procedures of the KEYS program.

Diane Barush of **Wilkes-Barre Area CTC Practical Nursing** commented: I am the Clinical Coordinator at the Practical Nursing program at Wilkes-Barre Area Career & Technical Center. I act as the Perkins's grant administrator for a consortium of practical nursing programs in our area. I have reviewed the Pennsylvania's WIOA Combined State Plan as requested but I am finding it very difficult to provide constructive commentary as I am very unsure of the exact effect the plan will have on our school. Our consortium utilizes Perkins funding to facilitate education for many disadvantaged and nontraditional students so this is certainly a very important topic. I am not able to attend the public meetings, however I do request further clarification on exactly how the proposal will change the current process.

Response: Perkins recipients must continue to meet the federal Perkins regulation and use the Perkins funds as mandated. At this time the US Department of Education has not provided guidance on the requirements of Perkins recipients regarding a Combined WIOA state plan. PDE is not able to provide additional guidance or analysis on the combined WIOA plan until USDE provides their guidance. PDE will continue to work with all Perkins recipients as guidance is released.

Dave Zartman of **Zartman Construction, Inc.** offered multiple comments to include:

- I am the immediate past chair of the Central Pa Workforce Development Board. I would like to address areas identified in the state plan that are of concern as written and offer recommendations that I believe support the Governor's goals outlined in the plan while allowing the local flexibility afforded throughout the Workforce Innovation and Opportunity Act.

Page 10, Section 2.1 of the plan sets a mandate for progressively spending 30, 40, and 50% of the Title I monies on training including a minimum of training on 70% of customers with barriers to employment over the next three years. While we support an increased emphasis on training, we currently don't have a waiting list for training priority of service individuals, even without minimum training expenditure thresholds. With this minimum expenditure requirement, we

could end up having to spend much larger training amounts on fewer clients while other needs go unserved. If this minimum expenditure requirement stays in the plan, the local boards, especially in rural areas, would need to significantly redirect spending. The most likely locations those monies would come from are Title I staffing and PA CareerLink® facilities. The Central Workforce Development Area currently covers nine counties with only six PA CareerLink® offices. Closing any one of our locations would impose significant increases of travel distances creating a barrier for both jobseekers and businesses.

If the minimum training expenditure requirement stays in the plan, please define what constitutes training so we know what counts towards the goal. A very rigid definition is likely impractical to accomplish; however if training is broadly defined and includes items like PA CareerLink® services that increase the job readiness skills of jobseekers and workshops provided specifically for training business customers, it will help local areas meet the Governor's training goals.

Response: We appreciate the comment and have revised the requirement to provide greater flexibility to local areas by allowing the utilization of non-Title I funds to meet the training targets. The revised language notes that a policy will be issued to include a definition of "training."

- Page 68 of the plan requires that 70% of the clients be priority of service clients. I agree priority of service clients should be first in line but to require a rigid percentage doesn't make sense. By our calculations, we would have needed to turn away services to 1,400 non-priority of service clients this past year to meet that threshold. Are we to tell them we met our quota and we can't help you? To me this would apply with any mandate on the percent served. Please consider setting a goal for increasing services to priority of services clients allowing each local area to establish its own thresholds based on the needs of the local population.

Response: We appreciate the comment but feel the priority of service threshold is appropriate. We note that the 70% requirement only applies to the WIOA Adult and Youth funding streams and will make that clear in the state plan. The commonwealth will also reassess the threshold on an annual basis.

- Page 16, Section 4.4 of the plan includes language that we spend a certain percentage of workforce development board monies on industry partnerships. This would be an unfunded mandate. If local boards are to provide financial support for industry partnerships, it is recommended the state distribute industry partnership funding to all local workforce development boards from the state's industry partnership funding in the state budget. This would support training for incumbent workers and local businesses without putting additional financial constraints on WIOA Title I resources.

Response: The commonwealth envisions Industry Partnerships as a state/local partnership and therefore expect local financial support of IPs. The commonwealth is drafting a policy that will address the use of WIOA funds for incumbent worker training.

- Overall, I feel the federal government with the passage of the WIOA gives the local areas autonomy making the decisions necessary to provide service to their population. There are

vast differences across our state and the needs of each WDB are different. The state plan in its current form will restrict that autonomy to the detriment of our clients.

There are also parts of the plan that would improve the system including data sharing and working together across state agencies. I am just looking to have the final document be workable for all parties.

Thank you for the opportunity to provide comments.

Response: We appreciate the comment and note that the State Plan seeks to balance local control and flexibility while assuring the governor's priorities are achieved.

Joanne Laub offered multiple comments to include:

- I appreciate the efforts of those who have worked hard to develop policy regarding implementation of the federally mandated WIOA in Pennsylvania. I realize that there are many challenges that the federal policy has provided, including the challenges to the Commonwealth of Pennsylvania. Governor Wolfe's plan has defined many admirable goals including the collaboration of data sharing among organizations as well as the more effective use of data in individual organizations and across different organizations.

The first goal of improving workforce development across state agencies is clearly an objective that government agencies should strive for. State agencies should work together to leverage resources to achieve the federal government's and the state's (including the Commonwealth's) strategic visions. These collaborations should also include employers and educational institutions, including non-profit institutional agencies. The policy often cites PA CareerLink as a strong resource for support for those who are striving to enter the workforce. I personally am skeptical about the PA CareerLink bureaucracy as I have seen people who have been striving adult learners who want to move themselves forward in the job force network, but have been stymied by the CareerLink requirements of individuals to participate in the program. Streamlining this agency to provide a more practical pathway could help the Commonwealth and the unemployed progress to achieve better employment goals.

Response: The commonwealth will consider ways to better streamline the PA CareerLink® system to increase employment opportunities.

- One of the goals of the Commonwealth's plan is to establish career pathways. This is also a laudable goal, and the policy states the career pathway combines education, training, counseling and support services from multiple programs. In addition, strategic partnerships between employers and educational institutions is crucial. Barriers to unemployment including post-secondary credentials and certifications have been identified. Unfortunately, one aspect that has been clearly overlooked is that since 2014, obtaining a high school equivalency (or GED) has become increasingly difficult, especially for those that we are striving to serve. Not only has the GED become unobtainable for so many, but it has also become a more commonplace requirement for all jobs, including jobs where it is not necessarily relevant. This policy, like many other entrenched policy decisions, is difficult to overcome. In order to advance the prospects of at-risk individuals, reducing the required scores to obtain the GED or reducing the employer requirements of having a GED would help many hard-working individuals who need

GED credentials to obtain or continue to perform in the jobs that they have been capably performing, would help improve the career pathways of hard working people who strive to succeed but are eliminated by the current regulations.

Response: The commonwealth has no mandate over employers and what skills and credentials they require of a prospect. It is also noted that the commonwealth does not set the passing scores for high school equivalency exams including the GED.

- I am sure that there is general agreement that increased work based learning opportunities for youth and educational opportunities for those who are dedicated is optimal. I hope that the Commonwealth does not ignore the individuals who are out of work based on requirements that are based mostly on lofty and bureaucratic policy concerns. Obviously, like the legislature, I have expressed mostly ambitions rather than practical solutions, but I hope that I have helped convey my position. Please consider the people that you are serving and how to attain both economic and human goals. Thank you for your consideration, and thank you for your efforts to improve many lives. Please look beyond political arguments and come to a conclusion that will help the Commonwealth move forward. Thank you for your consideration.

Response: We appreciate the comments.

Rookie2476@yahoo.com commented: No matter what hat I wear, OVR consumer, OVR CAC Member, Board Member, or Independent Living Specialist, my biggest concern by far is the lack of reference between the working relationship between Center's for Independent Living and OVR. I have personally been a part of this system since 1994 and when OVR and Centers for Independent Living have a good working relationship and they focus on their strengths individuals reach their goals. In the 90's and early 2000 the Washington district OVR office was 1st in the state in job placement. During that time period there was an ongoing collaborative effort between OVR and the local center for independent living to work with individuals with disabilities. Being too vague and not having requirements benchmarks and accountability will simply allow the same practices to continue. In the end this will only hurt the employment goals of people with disabilities state wide. Independent Living skills, resources and practices compliment Vocational services and are available if someone is not eligible for vocational services. A working relationship and referral process is key to successful vocational goals, and will greatly reduce the amount of individuals who fall through the cracks.

Response: We appreciate the comment. We agree that the CILs are a valuable partner and will include the CILs in the section on partner programs.