Pennsylvania released *Workforce System Policy No. 108-01, Change 1* on June 4, 2019. The Department of Labor & Industry, or L&I, Bureau of Workforce Development Administration, or BWDA, Policy Coordination Unit is indicated as the responsible area. Please address any questions or concerns you may have with the policy proper or this FAQ list to the unit’s email resource account: RA-LI-BWDA-Policy@pa.gov

**Can you give us a broader picture as to how this year’s plan modifications fit with L&I’s plans for the development and approval of the WIOA Combined State Plan as well as the regional and local plans?**

*Workforce System Policy No. 108-01, Change 1* offers a full explanation in “Section III Background” (see page 2). The policy states: “The effective date of the *PY 2020 – 2023 WIOA Combined State Plan* is July 1, 2020. There is a recognition of a mutual desire for greater collaboration between workforce system stakeholders and the PA Workforce Development Board, or PAWDB, to create the *PY 2020 – 2023 WIOA Combined State Plan*. LWDBs and other local area stakeholders indicated the requirement of an approved *WIOA Combined State Plan* in the drafting of strong integrated and aligned WIOA regional and local plans. After consultation with PAWDB and U.S. Department of Labor Employment and Training Administration, or ETA, the governor decided on a course of action that would extend all current WIOA Multi-Year regional and local plans to June 30, 2021. This action will permit more active *WIOA Combined State Plan* collaboration amongst all stakeholders while providing sufficient time for regional/local planners to reflect the state plan’s vision, goals and strategies within their respective regional/local plans.”

**My understanding is that our current local and regional plans were approved through June 30, 2020. Can you clarify?**

All WIOA PY 2017 – 2019 multi-year regional and local plans had an expiration date of June 30, 2020. Due to the plan offset approach adopted by Pennsylvania to increase regional and local-level stakeholder (e.g. local boards) collaborative efforts to help add more inclusive elements to the WIOA Combined State Plan, it was decided to extend all regional and local plans by one year. Therefore, the expiration date of the now-titled WIOA PY 2017 – 2020 multi-year regional and local plans is June 30, 2021. The extra year effectively creates a full four-year plan creating the key reason why a WIOA plan review is required.

**How are the local and regional plans staggered vis a vis the current and future state plans?**

Regional and local plans are effective one year after the state plan’s effective date.

**What is the value of regional and local plans being reviewed by the state partner’s this year (review and modification cycle) if any changes are primarily for compliance?**

L&I has improved the WIOA planning process, resulting plans and program metrics by adopting an inclusive partnership approach that highlights greater collaboration among state-level agencies involved with workforce development-oriented programs. This inclusive partnership approach has been incorporated into L&I’s relationship with the local boards. Finally, L&I has encouraged greater collaboration between state-level program partners and local boards. The WIOA state, regional and local plans are now a result of these partnerships.

The word “compliance” will be viewed in its strictest meaning in this answer. WIOA regional and local plan reviews are performed by local boards in compliance with WIOA statute. Before and during these plan reviews, it is possible that plan stakeholders (i.e. program partners) may present information to the local board that their respective program may have encountered a change that rises to the level of a plan modification. There are times when this is due to compliance with a change in the program’s authorizing statute and/or regulations. There are times when operational changes are required due to the manner a program partner provides program services and activities. In all these case, the local board is complying and applying these program parameters within the plans in question.

Also, plan modification(s) may affect the one-stop system. Program partners could be made aware of these modifications during the modification process to help produce a plan draft that elicits fewer public comments or program partner feedback during the plan review process.

Lastly, it is incumbent upon state-level program partners to review and acknowledge at least the plan modifications that affect their respective programs.

**Must the regional plan be modified?**

All regional plans must be reviewed for potential modifications. It is noted that **all** **current** regional plans must be modified because *Workforce System Policy No. 108-01, Change 1; Appendix C: Multi-Year Regional Plan Instructions* contained a change (see question number 1.3).

**Must the local plan be modified?**

All local plans must be reviewed for potential modifications. It is noted that **all** **current** local plans must be modified because *Workforce System Policy No. 108-01, Change 1; Appendix D: Multi-Year Local Plan Instructions* contains many program change (see question numbers 3.4, 4.10, 4.14 and Attestations).

**What happens if a plan review occurs and no modifications are warranted?**

In the absence of policy changes, if a regional or local plan review indicates no modifications are required, then the plan POC would ensure completion of the appropriate WIOA Plan modification form and submit the form (page 1 only) to L&I as evidence that a proper plan review was conducted.

**Must modified regional and local plans be approved by the full local board membership before L&I can approve the plans?**

Yes. L&I cannot approve submitted WIOA plans not approved by a quorum of the local board membership and duly authorized by the respective CEOs. These actions must be documented on the respective WIOA Regional Plan and WIOA Local Plan modification forms.

**What if it is not possible to present L&I with modified plans that were not yet posted for public comment or were not approved by the local board by Oct. 1, 2019?**

All regional and local area plan packages must be submitted electronically to the BWDA Policy Coordination resource account at RA-LI-BWDA-Policy@pa.gov by close of business on Oct. 1, 2019. If the plan modification draft is complete, and is accompanied by an appropriate WIOA Plan modification form providing the status of the plan in question, then L&I will perform a review of the plan modification draft. The submitted draft must be in MS Word format for the review to occur. L&I will return the draft with appropriate feedback to the local board for incorporation into the plan draft, if necessary. The local board must continue the plan modification process as detailed by L&I policy and guidance.

**Do the upcoming required plan mods need to be submitted on the new templates or simply revised using the previous template in which they were approved?**

No plan questions were moved out of order, added, deleted or modified; however, new minimum expectations were added to a few questions. The local boards may employ their current plan as the basis of the plan modification.

**Why are there two (2) L&I provided WIOA Plan Modification forms?**

After listening to local board feedback, it was decided to have separate regional plan and local plan modification submission forms. The main benefit is that each form has the capacity to capture the unique characteristics of each plan’s review, modification, posting, local approval and L&I approval processes.

**Regarding L&I approved structure exceptions:  WSP No. 02-2015, December 18, 2015 states “the chief elected official(s), in collaboration with the local WDB must submit a written request for a structure exception to the Department. This must happen every two years in conjunction with the development of the Local Plan or the Plan Modification.” The local board’s WIOA local plan describes the L&I approved structure exception and its separate divisions reporting to different chief elected officials and there have been no changes to the structure or reporting mechanisms.**

**In the event there are no foreseen changes to the approved structure exception can the approval of the local board’s WIOA local plan or respective plan modifications be considered sufficient to continue the L&I approved structure exception instead of submitting a separate letter requesting continued approval of the structure exception?**

If the local board indicates within the revised WIOA Local Plan Modification Form it wants to continue the previously approved structure exception, then a separate letter is no longer required.

**How can I obtain up-to-date labor market information and economic condition data for our local plans?**

Labor market and demographic information are available through CWIA. Requests may take up to a week to process. Inquiries should be directed to Ed Legge (elegge@pa.gov) or Kim DeLellis (kdelellis@pa.gov).

**Do the questions (or more appropriately, the minimum expectations) added to the new planning templates need to be addressed in the upcoming plan mod or only when a new plan is submitted next year?**

The plan modification will include new narrative addressing the added minimum expectations.

**Local Plan question 2.1 references the need to complete the ‘Goals and Strategies matrix’ found on the L&I website.  I’ve searched but cannot find the document.**

We are sorry, but the “Goals and Strategies matrix” language should have been removed from the recent planning policy release. Unfortunately, that was overlooked. BWDA removed the “Goals and Strategies matrix” template requirement after the release of the original planning policy because the local boards thought connecting the plan’s stated goals with the stated strategies was too confusing to accomplish on a form. L&I believes this is a valuable target to reach. For the next planning cycle, we’ll discuss with the local boards approaches that may make these important connections easier to articulate to the public and for L&I to review.

**Attestations: Since a local apprenticeship policy now appears to be required as part of the local plan’s attestation, must it be included in the upcoming plan mod or with next year’s new plan?**

Local board work-based training policies are expected to be completed by the end of the next planning cycle. Work-based training has become a larger share of the training provided to eligible WIOA Title I participants. It is appropriate that all local areas have policies that speak to Title I funds that support this type of training (e.g. apprenticeships and pre-apprenticeships, on-the-job training and customized training.) All local boards should have an incumbent-worker policy. Shortly after the next planning cycle ends, L&I may review local work-based training policies to inform state-level policy and guidance.

**Appendix E: Organizational chart indicates that the subtitles are required.  Would that mean for example it should read Chief/Lead Elected Officials(s) and include “Local WIOA Grant Recipient” or should we omit the words Local WIOA Grant Recipient?**

In this instance, if the CEO(s) are the local WIOA Title I grant recipient, then it is not required to add the “Local WIOA Grant Recipient” subtitle. If the local WIOA Title I grant recipient is an entity different than the listed CEO(s), then that entity needs to be identified as the “Local WIOA Grant Recipient” in addition identifying the CEO(s).

**Appendix F: WIOA Title I Programs Performance Accountability template. Does the performance information need to be updated in the plan mod due on October 1 or only in next year’s new plan?  Which performance year?**

The local board must use the new performance template to indicate the **current** WIOA Title I negotiated performance goals and the **prior** year’s attained results for this plan mod cycle. Local boards may use the most recent information as provided by CWIA. The local board may revise this template at any time, and not need to submit a plan modification to L&I. See the revised template for additional information.

**How can the L&I plan review and approval process be streamlined?**

Plan drafts may be provided to BWDA before they are posted for a preliminary review if the local board works collaboratively with affected state-level program partners (i.e. PDE’s CTE, DCED and L&I’s OVR) Once posted, BWDA will complete a technical review of the modified regional and local plans and offer feedback if necessary.

**In past L&I instructed local boards to highlight new information and add strike-throughs for information to be deleted but that was changed when the WIOA Plan Modification Form was revised to contain an area where plan changes are tracked. Why are we still highlighting or striking-out plan changes in the plan or any of the appendices?**

The WIOA Plan Modification Form’s section III (i.e. *Requested Plan Changes*) is designed to communicate in summary format (as few words as possible) the change’s subject. The summary is provided to help guide the public and plan reviewers to the complete modification within the plan proper. Copying text from the plan and pasting it within the *Requested Plan Changes* area is not required, as it adds unnecessary information to the plan mod form. There are also instances where the review process was delayed due to trying to include complete changes within the plan mod form. Highlighting new narrative (additions and contextual changes) or the striking-out deleted narrative not only indicates exactly what the modification is, but also streamlines the review process.

**Is there a preferred format to be used for submitting the modified plan for review?**

To ensure timely review, L&I recommends submitting plans and plan templates as MS Word files. Other supporting documents, such as the cover letter, proof of public notice or the WIOA Modification form, can be scanned and provided as a PDF.