

Comment #	Commenting Organization	Comment	Response
1	Standing Firm, Women's Center and Shelter	<p>STANDING FIRM, a national program of the Women's Center and Shelter of Greater Pittsburgh, equips employers to respond to domestic violence and is a critical link for a survivor to reach a life of safety.</p> <p>Almost all (99%) survivors of domestic violence report financial abuse. Financial abuse includes forcing a partner to miss, leave or be late to work; harassing a partner at work; controlling how money is spent; withholding money or basic living resources; giving a partner an "allowance"; stealing money, credit, property, or identity from a partner; and/or forcing a partner to file fraudulent legal financial documents or overspend on credit cards.</p> <p>A survivor may be forced to stay with an abuser because she is financially dependent. In a 2012 survey, three out of four victims said they stayed with their abusers longer for economic reasons. Of the 85% of victims who returned to their abusers, a significant number cited an inability to address their finances.</p> <p>The most direct path to financial stability is the ability to obtain and maintain employment. Therefore, an engaged and informed employer is essential to a survivor's financial stability and successful workplace experience. STANDING FIRM changes workplace culture and systems by empowering employers through consultation and training, so that survivors may move toward financial independence, and closer to a life free from abuse.</p> <p>The STANDING FIRM team reviewed the proposed Pennsylvania's WIOA Combined State Plan, and offers the following comments:</p>	<p>Thank you for your feedback. We are firmly committed to working with employers to ensure all individuals who want to work have access to employment and that employment is in a safe environment.</p>

		<ul style="list-style-type: none"> • <i>Section 2.4 The Department of Labor & Industry will specifically target services to help employers reduce their stigma around hiring individuals with barriers and will help employers diversify through programs such as the Work Opportunity Tax Credit and the Federal Bonding program.</i> <ul style="list-style-type: none"> ○ The STANDING FIRM team supports all efforts to reduce stigma in experiencing domestic violence and is ready to support employers to recognize and respond to domestic violence in the workplace through its consultation and training. 	
2	Standing Firm, Women's Center and Shelter	<ul style="list-style-type: none"> • <i>Section 5.2 Improve employment opportunity, workplace inclusion, and professional networking and mentoring opportunities for populations that experience stigma, bias, and discrimination. Expand on existing strategies and explore new approaches to reduce bias, from recruiting to hiring and employment</i> <ul style="list-style-type: none"> ○ The STANDING FIRM team supports all efforts to reduce stigma in experiencing domestic violence and is ready to support employers to recognize and respond to domestic violence in the workplace through its consultation and training. 	Thank you for your feedback. We are firmly committed to working with employers to ensure all individuals who want to work have access to employment and that employment is in a safe environment.
3	Standing Firm, Women's Center and Shelter	<ul style="list-style-type: none"> • <i>Section 5.12 Support workforce development staff to recognize and address hidden barriers to employment for individuals served by WIOA core and partner programs. The Commonwealth will support workforce system staff in addressing factors that may present a barrier to employment, but which are not immediately apparent, and which may be associated with social stigma or societal expectations not to disclose, making them more difficult to identify and consider when helping an individual secure employment.</i> 	Thank you for your feedback. We are firmly committed to working with employers to ensure all individuals who want to work have access to employment and that employment is in a safe environment.

		<ul style="list-style-type: none"> ○ Many survivors are afraid to disclose their experiences for fear of retaliation or termination. Unfortunately, when a survivor experiences domestic violence without support and safety planning, the risk of violent workplace incidents may increase significantly. The STANDING FIRM team supports all efforts to reduce stigma in experiencing domestic violence and is ready to support employers to recognize and respond to domestic violence in the workplace through its consultation and training. An appropriate workplace response not only improves survivor employee retention but increases safety in the workplace for all. 	
4	Standing Firm, Women's Center and Shelter	<ul style="list-style-type: none"> • <i>Sections 6.2 and 6.3</i> <ul style="list-style-type: none"> ○ Both sections include recommendations that address worker shortages and needs in specific sectors predominantly staffed by women, who experience domestic violence at a much higher rate than men. <ul style="list-style-type: none"> ▪ The STANDING FIRM team supports all efforts to improve survivor employee retention and increase safety in the workplace for all. 	Thank you for your feedback. We are firmly committed to working with employers to ensure all individuals who want to work have access to employment and that employment is in a safe environment.
5	Pardon Project	<p>Re: 2024-2028 WIOA Combined State Plan July 1, 2024 – June 30, 2028</p> <p>I greatly appreciate the opportunity to comment on the proposed Combined State Plan for the next four years because, despite its 450 pages and 197,000 words, it makes not one single reference to the importance of pardons to the workforce that Pennsylvania needs to grow, thrive and compete domestically and internationally.</p>	<p>Thank you for your feedback.</p> <p>Goal 5.16 was added to the Plan on page 37, specifying the PA WDB will work with local WDBs on hosting pardon related events. (Previous Goal 5.16 is now goal 5.17).</p> <p>While there is always room for</p>

		<p>In April 2020, the Economy League produced a pathbreaking report titled <i>Pardons as an Economic Investment Strategy: Evaluating a Decade of Data in Pennsylvania</i>.¹ It calculated the economic impact of the 1,310 pardons that had been granted between 2009 and 2019. It found that pardons had resulted in \$16.7 million in new revenues, spread across the state, simply by allowing people to compete for and earn higher paying jobs for which they were qualified, but from which they had been barred simply because of their criminal records. These findings caused the Economy League to conclude that pardons should be considered “workforce development and community investment policies” and to recommend that more pardons be granted more quickly.</p> <p>Reviewing the report, the Secretary of the Department of Labor and Industry Gerard Oleksiak commented: “One of our department’s key objectives is to make Pennsylvania’s workforce globally competitive, and that means preparing job seekers through employment and job training services. It’s enormously frustrating that a criminal record from 5, 10, even 15 years ago can stop them from getting good jobs today. This report shows that getting past those histories is key to Pennsylvania’s economic future. I applaud Lt. Governor Fetterman and the Board of Pardons for what they have already done to make pardons more accessible and encourage them to keep going.”</p> <p>For his part, then-Attorney General Josh Shapiro (who was a member of the Board of Pardons) voiced similar support: “The facts are clear: we all benefit when people who’ve paid their debt to society and are ready to contribute to our community have the opportunity to truly get a second chance....</p>	<p>continuous improvement, we disagree that no administrative actions were taken as a result of WDB recommendations. Examples of such actions included:</p> <ul style="list-style-type: none"> • The Pennsylvania Department of Transportation has been working with county prisons across the Commonwealth to increase the number of individuals leaving county jails have government issued ID. • The Pennsylvania Department of Corrections also has an agreement with the Department of Transportation to provide reentrants with government issued ID. • Since 2022, The Pennsylvania Department of Corrections has been operating a Technology Workshop in the Reentry Services Offices inside SCIs to provide interactive instruction to increase digital literacy for incarcerated individuals. This was revamped in 2023. • Since 2017, the Pennsylvania Department of Labor & Industry has awarded over \$11.3 Million in Youth Reentry grants impacting 20 projects.
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¹ <http://economyleague.org/pardonimpact>

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² <https://plsephilly.org/pardon-recidivism-study>

		<p>significantly lowered their recidivism rates (greatly reducing incarceration costs of these individuals), increasing the BOP's ability to process pardons makes economic sense for both the individuals and the commonwealth as a whole.³</p> <p>November 2021: The Commonwealth should take all requisite steps, including, if necessary, promulgating new regulations, to ensure the prompt review (within one year) by the Board of Pardons of all applications for pardon from Pennsylvanians who completed their sentences five or more years ago on convictions that did not include crimes of violence and who have remained arrest-free ever since.</p> <p>The number of applications for pardon has almost doubled in one year and is expected to double again next year.... The Board of Pardons has developed "accelerated review" programs for certain categories of cases: offenses that are related to marijuana that did not involve crimes of violence, offenses that occurred 15 or more years ago that did not involve crimes of violence, and applications that are supported by the local District Attorney. Those programs are of obvious importance to Pennsylvania's workforce, employers as well as employees, and are appropriately generating increased demand from around the state.⁴</p> <p>May 2023: The Workforce Development Board urges the Governor to consider supporting legislation providing immunity from civil liability for any claim or adverse inference arising out of the decision by an employer to train, employ, promote, contract with, or otherwise engages in its work an individual with a criminal history record, so long as that those activities</p>	
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³ <https://www.dli.pa.gov/Businesses/Workforce-Development/wdb/Documents/8-12-20-PA-WDB-Briefing-Book.pdf>

⁴ <https://www.dli.pa.gov/Businesses/Workforce-Development/wdb/Documents/11-9-21-WDB-Briefing-Book.pdf>

		<p>are not specifically prohibited by a condition of parole, probation, release, regulation, or contract.</p> <p>The Governor, the Auditor General, the Secretary of Labor and Industry, and other leaders have noted that criminal history records impose significant adverse impacts on the breadth, depth and diversity of Pennsylvania’s workforce and on the Commonwealth’s efforts to make Pennsylvania's workforce globally competitive. Workforce development agencies across the Commonwealth report that it is difficult for well-qualified candidates to find employment appropriate for their skills, education and training simply because of their past history of involvement with the criminal justice system. “Ban the box” laws that punish employers for considering criminal record histories when they shouldn’t, and tax incentives for hiring returning citizens, have proven to be ineffective. Employers report that they are reluctant to hire qualified candidates with a criminal history record due to a lack of clarity regarding the employer's risk of liability for such hire and the possibility of having to defend themselves in lawsuit for having made such hire.</p> <p>And The Workforce Development Board, being on record since November 2021 as supporting pardons for those who have fully completed their sentences for non-violent crimes and have been arrest-free since then for at least five years, calls on the Department of State to rewrite its proposed regulations implementing Act 53 of 2020 so that, for such individuals, the presumption (rebuttable) is that their criminal histories are not “directly related” to any occupational license for which they are applying. The Workforce Development Board recommends that the rebuttable presumption be that criminal histories are not directly related to the occupational license, unless the conviction was within 7 years.</p>	
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⁵ <https://www.dli.pa.gov/Businesses/Workforce-Development/wdb/Documents/05-24-23-WDB-Briefing-Book.pdf>

		<p>The Governor, the Auditor General, the Secretary of Labor and Industry, and other leaders have noted that criminal history records impose significant adverse impacts on the breadth, depth and diversity of Pennsylvania’s workforce.</p> <p>There is no question whatsoever that the Workforce Development Board and its partners - the regional and local boards, the public authorities, the private employers and the unions with which they work – have an essential and fundamental role to play in reducing those adverse impacts and achieving this more equitable and brighter future, by helping to erase criminal records and to protect employers who look beyond those records to conduct their businesses. Please do not finalize the 2024-28 WIOA Combined Plan without recognizing that role and elevating it to the level of a priority, expressing it often throughout the Plan.</p> <p>Thank you for your consideration of these comments.</p>	
6	Community Justice Project	<p>Dear Pennsylvania Workforce Development Board:</p> <p>The Pennsylvania Department of Labor & Industry (L&I) and the Pennsylvania Workforce Development Board (PWDB) have published for public comment a proposed Pennsylvania Workforce Innovation and Opportunity Act (WIOA) Combined State Plan for 2024—2028. The Community Justice Project (CJP) and Community Legal Services (CLS) submit these comments in support of the Plan.</p> <p>CJP and CLS are legal services programs within the Pennsylvania Legal Aid Network. Our two programs have decades of experience representing low-income families and individuals, including individual case representation and policy advocacy on public assistance matters. The WIOA State Plan provisions regarding Priority of Service for training and career counseling</p>	<p>Thank you for your feedback. We agree that ensuring that federal rules are followed with respect to priority of service is essential.</p>

		<p>are of particular interest to our clients, as these provisions require that requests for these important services by public assistance recipients take precedence over others. For that reason, our comments are focused on Priority of Service.</p> <p>As a baseline for these comments, Pennsylvania’s original WIOA Combined State Plan, covering the years 2016-20, included comprehensive provisions implementing federal WIOA Priority of Service requirements, which we strongly supported. Those provisions were subsequently incorporated into Pennsylvania’s Combined WIOA State Plan for 2020-24, which we also supported. In 2022, however, the 2020-24 Plan was modified. In our comments on Pennsylvania’s proposed modified 2020-24 WIOA state plan we pointed out that the proposed plan omitted language from the original 2016-20 WIOA state plan that we felt were important to ensure a clear understanding of the meaning of Priority of Service, as well as its proper implementation. More specifically, the proposed modified state plan omitted definitions of key Priority of Service terms and explanation of how Priority of Service works in practice. We recommended in our comments that these definitions and explanation be inserted back into the plan. The final Modified Plan did not, however, include these suggested policy clarifications.</p> <p>It is important to mention, however, that, in addition to the Priority of Service provisions in the WIOA Combined State Plan, the Department of Labor and Industry also has a stand-alone Priority of Service Policy providing guidance to the Local Workforce Development Boards (LWDBs). In March of 2022, the Department published proposed revisions to update its stand-alone Priority of Services policy. In our comments on the proposed revisions, we noted with approval that the revised policy included the very same definitions of key Priority of Service terms, along with explanations of how this policy should</p>	
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		<p>operate in practice, that we had recommended be reinserted into the proposed Modified 2020-24 WIOA State Plan.</p> <p>The final stand-alone Priority of Service Policy, dated April 28, 2022, was issued unchanged from the proposed policy and, thus, served to fill in the gaps we were concerned about with the Proposed Modified 2020-24 Plan. In particular, the policy provides definitions of key terms, such as the “federal statutory priority” and the groups that are entitled to priority (including “public assistance recipients”; “low-income individuals”; and “individuals who are basic skills deficient”), so that these groups can be more easily identified by LWDBs. The stand-alone policy also includes a clear statement of how priority of services is applied, consisting of a cascade showing the order of priority among the universe of possible types of applicants for services or training.</p> <p>Turning now to the proposed WIOA Combined State Plan for 2024-28, we note that the Priority of Service provisions in the Plan are identical to those in the Modified WIOA Combined State Plan for 2020-24. As was the case with the Modified 2020-24 Plan, however, the Department’s stand-alone Priority of Service policy fills the gaps in the proposed 2024-28 Plan. Thus, in our view, the proposed 2024-28 WIOA State Plan and the Department’s April 28, 2022 stand-alone Priority of Service Policy, taken together, provide complete and satisfactory guidance on federal and state Priority of Service requirements. We therefore support Pennsylvania’s Proposed WIOA Combined State Plan for 2024-28.</p> <p>Thank you for considering these comments.</p>	
7	PA Partnerships for Children	<p>I am writing on behalf of Pennsylvania Partnerships for Children (PPC) to provide public comments on the draft of the 2024-2028 Workforce Innovation and Opportunity Act (WIOA) State Plan</p>	<p>Thank you for your feedback. We agree that streamlining the process of registering new apprenticeship programs</p>

		<p>for Pennsylvania. PPC is the statewide child advocacy organization in Pennsylvania with a vision to ensure every child living in the commonwealth can thrive and reach their full potential. PPC is committed to implementing policy solutions that positively impact perinatal and children’s health, child welfare, early care and education, and K-12 education. Within K-12 education, our work centers on career and technical education (CTE), as it is critical to ensuring that Pennsylvania properly educates and prepares a workforce to enter a competitive, worldwide economy. As a key stakeholder deeply invested in the success of our local workforce and economic development, we appreciate the opportunity to offer insights and recommendations that align with the interests and needs of our students, families, educators, and the broader community.</p> <p>Governor Shapiro’s 2024-2028 state plan outlines six goals for the improvement of Pennsylvania’s workforce system. The following includes comments regarding several of the goals especially pertinent to the state’s youth and their families:</p> <p>Goal 1: Apprenticeship and Career & Technical Education</p> <p>We commend the Governor for prioritizing earn and learn models specifically registered apprenticeship and pre-apprenticeship programs, but we encourage the state workforce plan to prioritize streamlining the registration process and diversifying the model for registered apprenticeship and pre-apprenticeship programs. It must be acknowledged that a slow and inflexible system is discouraging employers from registering their apprenticeship programs and that the traditional registration process may be inaccessible to non-traditional apprenticeship models.</p> <p>Additionally, an apprenticeship model serves as a tool in the talent toolbox of employers – proven models of regional</p>	<p>is a priority. Pennsylvania will continue to prioritize this goal.</p> <p>The PA Apprenticeship and Training Office’s Pre-Apprenticeship Division expanded its work in 2023, and will expand its staff in early 2024 with hopes of further positive outcomes . Pre-apprenticeship program priorities were refocused during the year due to the implementation of Act 158, raising heightened consideration for existing and new programs specifically targeting youth. Act 158: Pathways to Graduation allows for successful completion of a pre-apprenticeship program as a potential alternative assessment pathway to the Keystone Exams. The ATO further strengthened the relationship between the Department of Labor & Industry (L&I) and the Pennsylvania Department of Education (PDE) with cross-agency collaborative presentations between the Pre-Apprenticeship Division at the Integrated Learning Conference, Apprenticeship Expo, and SAS Institute. Beginning the 2024 school year, the Pre-Apprenticeship Division was included in the Career Ready PA REBoot Camp – a statewide series of trainings designed by the Career Ready PA Coalition for educators across the Commonwealth to learn about career readiness for their students while</p>
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		intermediaries that offer technical assistance, guidance and support is critical to re-design and sustain the traditional talent development pathways to quality ‘earn and learn’ activities. The bridge from CTE to Apprenticeship is one that should be strengthened and invested in, for youth and young adults as well as incumbent workers. We encourage the State Workforce Development Board to break down agency silos and improve coordination amongst Departments to align education and apprenticeship standards, practices, and technical assistance for CTE providers and Apprenticeship programs.	gaining Act 48 credits. These trainings reached a total of 130 districts and 235 participants. The ATO’s increased partnerships with Career and Technology Centers (CTCs) statewide resulted in a total registration of 45 more Pre-Apprenticeship Programs either sponsored by or affiliated with CTCs.
8	PA Partnerships for Children	<p>Goal 3: Youth</p> <p>While the plan demonstrates a commitment to prioritizing services for youth workforce development in Pennsylvania, the plan lacks explicit information on resource allocation, raising questions about budgetary considerations and sustainability of youth programming in Pennsylvania. Additionally, in reference to evidence-based quality summer programs, we encourage the plan to engage with local subject matter experts operating summer programming to inform a state “framework” and establish an appropriate system of support and technical assistance, including access to data that is appropriately shared with the local system for programming purposes. Lastly, the plan relies on collaboration among various state agencies and offices, we encourage consistent inclusion of local workforce development boards, and their subsequent youth committees to determine appropriate approaches to youth programming at the local level.</p>	<p>Thank you for your feedback.</p> <p>The standing Youth Committee with the PA WDB will continue to prioritize these issues. That committee includes members of local workforce development boards.</p> <p>WIOA Youth funding allocations are driven by federal formulas and are articulated in the state plan under Section 5 A (i).</p>
9	PA Partnerships for Children	<p>Goal 5: Barrier Remediation</p> <p>We encourage the state to prioritize data collection and information sharing with local workforce boards to better assess program effectiveness with an equitable lens for the benefit of individuals with a barrier to employment and for all customers. Access to unemployment claimant, unemployment wage, and new hire data for local workforce development</p>	<p>Thank you for your feedback.</p> <p>We have updated the statement in the plan to include the proposed additional language on page 21 of the Combined State Plan.</p>

	<p>boards will provide the essential information local boards need to improve their service delivery for their customers.</p> <p>Diversity, equity, inclusion and accessibility are noted throughout the plan; however, we ask the State Workforce Development Board to craft a DEI-A equity framework or similar approach that can best inform state and local plans, programs, and investments. The Pennsylvania Department of Education may be a key partner to the Board in understanding sub-population demographics, data analysis, and DEI-A centered policies to support vulnerable populations in need of workforce development services and supports.</p> <p>The workforce, education, and training programs outlined in the Plan may or could often serve common customers. Local programs are often faced with the task and bureaucracies to navigate multiple agency rules, systems, databases, preferences, and approaches to braid eligibility, funding, services, and compliance when serving a single customer. Local staff must have a better understanding of the barrier remediation ‘playbook’ to crosswalk what’s allowed, what’s not allowed and leverage WIOA, Wagner-Peyser, TANF, Perkins, SNAP, TAA, JVSG, Job Corps, CBSG, UC, SCEP, REO programs, etc. We encourage the State Workforce Development Board to fully assess the WIOA Combined Plan programs for state policy and program approaches that maximize local flexibility for program eligibility, co-/dual enrollment, needs assessments, leverage training and supportive services funds, promote efficient case management, lessen the burden of local staff performing administrative and duplicate tasks, and promote performance improvement through data access and analysis.</p> <p>We ask that if the State anticipates or expects a change in who is being served related to the goal of barrier remediation, the</p>	<p>The PA WDB supports sharing data with locals where legally allowable.</p> <p>The PA WDB will explore how it can take a more active role in the development of DEI-A programs across state agencies active in workforce development.</p> <p>The PA Apprenticeship and Training Office continues to focus on creating more inclusive and equitable opportunities to serve individuals from populations traditionally underserved through registered apprenticeship. In addition to new collaborations with the PA Office of Vocational Rehabilitation, requirements around assisting underserved populations are now built into every grant opportunity offered. In June, the ATO also awarded approximately \$400,000 under its <i>Increasing Diversity, Equity and Inclusion in the Building and Construction Trades through Apprenticeships and Pre-Apprenticeships</i> initiative, which supports alignment, expansion and diversification of the apprenticeship model within the building and construction trades to reach underrepresented populations, including women, people of color, individuals with disabilities, veterans, socio-economic disadvantaged individuals, individuals who speak English as a second language,</p>
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		<p>state should, with some evidence, incorporate priorities within the Plan and embed strategies and data-informed approaches into their performance negotiations with ETA and local workforce areas.</p> <p>Lastly, the state plan outlines a need for improvement regarding “Incorporating regional partnerships to address shared challenges through collaborative solutions in common labor markets inclusive of multiple Local Workforce Development Areas.” We ask the State Workforce Board to consider the following: “Incorporating regional partnerships to address shared <i>interests and</i> challenges through <i>administrative and</i> collaborative solutions in common labor markets inclusive of multiple Local Workforce Development Areas.”</p>	<p>individuals who were previously incarcerated, or individuals experiencing multiple barriers to employment. The awarded grantees are in the early stages of project implementation, but the ATO expects to see significant project impacts during the 2024 calendar year.</p>
10	PA Partnerships for Children	<p>Goal 6: Addressing Workforce Shortages in Critical Industries</p> <p>Employer engagement with the workforce system is essential to addressing the workforce shortages among the critical industries outlined in the state plan. Local workforce development boards are the experts in their local economies and local employer needs throughout the state. We encourage the state to support local workforce development boards in determining the appropriate connection of employers in these critical industries to the workforce system.</p> <p>Additionally, the development of career pathways to these critical industries must become easily navigable regarding the credentialing needs of employment opportunities and the training services available. We encourage the collaboration of state agencies to map out credential and career pathways for critical industries and to evaluate a diversity of models for education and workforce training.</p> <p>The Pennsylvania State Workforce Board has the unique position to convene all state agencies around workforce development policy and the continuous improvement of the</p>	<p>Thank you for your feedback.</p> <p>The PA WDB continues to convene members from all WIOA core and partner agencies on a monthly basis to discuss topics related to workforce development. Additionally, the PA WDB currently convenes 11 committees on a variety of topics related to workforce development priorities in the commonwealth. Membership on these committees includes both local WDB staff and PA CareerLink® staff.</p>

		workforce system. This collaboration and coordination of effort will be essential to achieving the Governor’s six goals of the state plan. We encourage the state workforce board to capitalize on this unique position and be intentional in the collaborative efforts among agencies and local workforce development boards and PA CareerLink® subject matter experts.	
11	PA Early Learning Investment Commission	<p>(Page 36, 5.14): Assist employers to retain employees, and help workers maintain full employment, through better job quality.</p> <p><i>The Commonwealth will develop ways to educate employers on characteristics of a quality job, such as child care and pay; help employers take advantage of existing programs that promote job quality, such as federal tax credits for offering childcare; develop model workplace policies with Workforce Development Board (WDB) members and WDB committees; and propose incentives that the state can provide to employers for implementing job retention policies that remove barriers for WIOA-identified populations, such as family-friendly childcare and leave policies.</i></p> <p>Comments/Responses:</p> <ul style="list-style-type: none"> • Investments in Caring PA, a resource from the Pennsylvania Early Learning Investment Commission is a free, online resource for Pennsylvania employers that should be included in this strategy (investmentsincaringpa.com). <ul style="list-style-type: none"> ○ Investments in Caring PA provides data and information to help businesses understand the economic impact of insufficient childcare and tools and options to better support working families and child care. This Pennsylvania-specific resource includes a 	<p>Thank you for your feedback.</p> <p>We agree that the childcare workforce is facing many challenges. The PA WDB Barriers committee, while only recently launched, has already focused in on developing recommendations to address the challenges facing the childcare workforce. Other committees, including those focused on critical industry sectors, have raised the issues facing the childcare economy and the childcare workforce as issues that impact their sectors’ abilities to grow and thrive, as well.</p>

		<p>business toolkit describing a variety of child care support options of businesses to consider and information on existing best practices and programs around child care, tax credits, incentives, employee benefits, and more. The working families toolkit is a quick and easy resource that businesses can pass along to employees to help them find quality, affordable child care and child development resources.</p> <ul style="list-style-type: none">•The early childhood educator workforce should be highlighted as part of the workforce L&I is looking to retain through increased wages and benefits. Childcare providers are the workforce behind the workforce yet significantly low wages are contributing to a child care staffing crisis. From the January 2023 report, “The High Cost of Working in Early Childhood Education,”:<ul style="list-style-type: none">○Early childhood teachers earned an estimated \$12.43 per hour or less than \$25,844 per year.○In 100% of the 67 Pennsylvania counties, earnings failed to meet the cost-of-living. In other words, earnings are not sufficient to cover basic necessities like housing, transportation, food, and child care.○There are racial disparities even after job title, education, geography, and program quality are taken into account. Black educators earn approximately 2% less than their white counterparts. Hispanic educators make 5% less, and other groups, including Asian and multiracial educators, make 10% less than white educators.	
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12	PA Early Learning Investment Commission	<p>(5.5, Page 34): Invest in regional and local strategies that address multiple, individual or community-wide barriers to employment, through applying supportive services funds, braiding funds, program cost-sharing, cross-training staff, and other means of coordination and collaboration across sectors and across state agencies.</p> <p><i>The Commonwealth will monitor progress on how well the workforce development system has increased the availability and accessibility of employment-related supports through the utilization of braided funds, program cost-sharing, and collaboration of resources. The Commonwealth will track the number of workers benefiting from employment-related supports such as childcare, transportation, food, housing or rent assistance, work clothes and tools, etc. through braided funds and program cost sharing.</i></p> <p>Comments/Responses:</p> <ul style="list-style-type: none"> • The <u>Pennsylvania Early Learning Investment Commission</u> (PA ELIC) serves as a nonpartisan convener of vested public and private-sector partners. Our work advancing early learning is informed by national research, evidence, principles of DEIA, and guided (but not restricted) by best-practice. <ul style="list-style-type: none"> ◦ PA ELIC highlights innovative and best practices and collaborations happening across Pennsylvania around quality early learning and care for working families; specifically around the need for child care as a workforce support. • “Quality” should also be a driver in monitoring progress of employment-related supports. • Attracting and retaining quality teachers is the 	<p>Thank you for your feedback.</p> <p>Childcare, where noted in the comments, has been changed to “quality childcare.”</p> <p>Thank you for sharing these best practices. The PA WDB has convened an Education Workforce Committee. Included in this committee’s focus is early childhood education and the teachers needed to make the system function. This committee will work to develop recommendations to ensure that Pennsylvania has strategies to train, recruit, and retain early childhood educators.</p>
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		<p>foundation for strengthening and increasing a community's capacity to serve young children with safe, enriching early learning programs. Consistency in childcare teachers also assures reliable care for the children of working parents, which decreases turnover in the local workforce and boosts on-the-job productivity.</p> <ul style="list-style-type: none"> ○One regional strategy: The York County Early Childhood Educator Awards initiative raised money from local government, philanthropy, and corporate donations to help increase compensation of childcare providers. ○Early learning programs operate on ultra-thin margins, especially since the pandemic disrupted operations, and struggle to pay salaries that retain qualified people. The York County Early Childhood Educator Awards incentivize qualified educators to stay in the field, which improves quality by reducing turnover. ○The impact of this program includes increased retention of quality ECE teachers in York County, as well as increasing childcare slots for working families across York County. ○Increased public investments into similar strategies would help to address the ECE teacher shortage across Pennsylvania. 	
13	PA Early Learning Investment Commission	<p>(5.7, Page 35): Work with workforce development system partners to improve childcare and dependent care access, affordability, and availability in the needed places and at the needed times to enable full employment for individuals.</p> <p><i>The Department of Labor & Industry, the Department of Human Services, and the Department of Education will collaborate to</i></p>	<p>Thank you for your feedback and sharing these best practices.</p> <p>Childcare, where noted in the comments, has been changed to “quality childcare.”</p>

		<p><i>address childcare and dependent care as a barrier to full employment. In addition to strengthening connections between state agencies, the Commonwealth will support the strengthening of connections between county agencies and local workforce development boards to support childcare and dependent care.</i></p> <p>Comments/Responses:</p> <ul style="list-style-type: none"> • The Pennsylvania Early Learning Investment Commission and Investments in Caring PA (investmentsincaringpa.com) can be a key resource when monitoring progress and developing plans for investments in regional and local child care strategies that can: <ul style="list-style-type: none"> ○ Identify intersecting cross-sector, public and private goals in which quality childcare is a factor contributing to successful business and economic outcomes. ○ Seek to leverage private sector innovation and entrepreneurship to draw untapped revenue sources into the childcare ecosystem. ○ Facilitate statewide understanding of the economic value of quality childcare as quality early learning. ○ Be a convener to include and engage subject matter experts (state-level agencies, OCDEL, childcare providers, advocates, economists, human resource officers, local and regional Chambers and associations, U.S. Chamber of Commerce Foundation, national resources). ○ Provide employer-focused tools, resources, and strategies to recruit, retain, and engage working families through child care (Investments in Caring PA). 	
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		<ul style="list-style-type: none"> Embrace and elevating transformative models for replication and increases in scope and scale (Case study examples highlighted at investmentsincaringpa.com) 	
14	PA Early Learning Investment Commission	<p>(6.2, Page 37-38): Address worker shortages in healthcare and long-term care industries, focusing on direct care and community health sectors, by increasing the number of qualified healthcare and long-term care professionals.</p> <p><i>The Department of Labor & Industry will work to address worker shortages in critical healthcare and long-term care occupations, with specific strategies to increase direct care workers (e.g., nurse aides, home health aides, home care, and community health workers). This approach will encompass strengthening essential support services, ensuring accessibility to crucial resources such as childcare, transportation, food and housing. The PENNSYLVANIA WORKFORCE DEVELOPMENT BOARD will maintain a committee focused on the healthcare and direct care workforce.</i></p> <p>Comments/Responses:</p> <ul style="list-style-type: none"> In alignment with section (5.5, Page 34): “Invest in regional and local strategies that address multiple, individual or community-wide barriers to employment, through applying supportive services funds, braiding funds, program cost-sharing, cross-training staff, and other means of coordination and collaboration across sectors and across state agencies.” Healthcare Child Care Strategy Example: Thanks to Investments in Caring PA (investmentsincaringpa.com) and an introduction by Creative Child Care Solutions, Evangelical 	<p>Thank you for your feedback and sharing these best practices.</p> <p>Childcare, where noted in the comments, has been changed to “quality childcare.”</p>

		<p>Community Hospital partnered with Patch Caregiving, the first and only child care benefit designed for the frontline workforce, to co-design a drop-in child care program for its workforce.</p> <ul style="list-style-type: none"> ○ Evangelical subsidizes a portion of the costs and parents pay a tiered copayment based on their hourly rate of pay. Copayments are collected through payroll deduction to make it seamless for employees. ○ In the short time since launch, the program has already had an immense impact for Evangelical and its parent employees. Some highlights include: <ul style="list-style-type: none"> ▪ More than 50% of the eligible employee population has enrolled in the program, with more parents and caregivers enrolling each day. ▪ The program has already helped avoid 45 parent absences from work and has served over 20 families. ▪ Patch is already caring for kids 70% of days the program is open (with this number continuing to rise!). ▪ Parents are using the drop-in care to solve a variety of child care challenges including school closures, caregiver vacations or illness, and last minute work schedule changes. ▪ More Info: https://www.patchcaregiving.com/evan • New value could be created by taking an entrepreneurial approach and monetizing benefits for businesses (like healthcare) that market to 	
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		working parents or employers.	
15	PA Early Learning Investment Commission	<p>(Page 130): Supportive Services – WIOA funds can support a variety of supportive services for apprentices, including annual dues, registration fees, books, supplies, childcare, transportation, tools, and uniforms.</p> <ul style="list-style-type: none"> • The Pennsylvania Early Learning Investment Commission is taking an entrepreneurial approach to addressing the problem of child care resource scarcity by finding new ways to create value and generate revenue to enhance child care business models. A promising opportunity for the Dept of L&I is to explore new value and revenue for this business sector model, specifically around ECE apprenticeships. 	<p>Thank you for your feedback and sharing these best practices.</p> <p>The Childcare Apprenticeship Initiative, led the PA Apprenticeship and Training Office, is currently in the planning stages to expand Childcare and Early Learning Registered Apprenticeships across the state to continue addressing this barrier to the workforce. The goals are to increase the number of childcare workers, assure they are earning living wages, and serve the childcare needs of families participating in other registered apprenticeship programs.</p>
16	Leadership and Community Vitality Team	<ol style="list-style-type: none"> 1. Due to changing demographics, more effort needs to go into upskilling or retraining the current workforce. Employers who need to fill skilled positions should be able to train incumbent workers to fill those positions, creating career ladders for employees and reducing turnover within companies. The various WDBs have different rules and regulations regarding incumbent worker training dollars and nobody makes it easy or simple for employers to access these funds. 	<p>Thank you for your feedback.</p>
17	Leadership and Community Vitality Team	<ol style="list-style-type: none"> 2. Additionally, more effort needs to be made to get workforce areas on the same page. Yes, they should be responsive to local workforce needs and demands, but navigating all of those systems is unbelievably difficult and time consuming for an employer who functions in multiple workforce regions. Apprenticeship programs also create a need to cross workforce regions and working with multiple boards, with their various steps and rules and paperwork is a nightmare. Perhaps 	<p>Thank you for your feedback.</p> <p>As a proven model for workforce training, an increasing amount of State and Federal support is available to apprentices and program sponsors, including: Workforce Innovation and Opportunity Act (WIOA), Office of Vocational</p>

		<p>funding for apprenticeship training (the RTI) should be handled statewide by one entity, with a specific budget available for each workforce region. Something needs to be done to streamline the process or all of the work building apprenticeships will be for nothing.</p>	<p>Rehabilitation (OVR) funding, Grant Programs at the PA Department of Labor and Industry (L&I), DCED Pre-Apprentice and Apprentice Grant Program, veteran specific funding and resources, intermediary incentive funding and beyond.</p> <p>Although the type and amount of WIOA funds available to support apprenticeship is determined by each region's local Workforce Development Board (WDB) some funds are dispersed statewide including discretionary grants awarded through the PA Apprenticeship and Training Office.</p> <p>In addition to the PAsmart program described above, there are numerous grants and financial aid resources available that can assist individuals and organizations in meeting their apprenticeship goals. Current notice of grants availabilities and recent grant awardee announcements through the PA Department of Labor and Industry Workforce Development System and Deputate can be found on L&I's Grant Opportunities website, www.dli.pa.gov/Businesses/Workforce-Development/grants/Pages/default.aspx. To be contacted regarding future workforce development grant opportunities please send your email</p>
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			address with your name to ra-libwda-general@pa.gov.
18	Leadership and Community Vitality Team	3. Regarding apprenticeships, the council process is not conducive to starting more apprenticeships. It is cumbersome and clunky and takes far too long to get new programs through the process.	Thank you for your feedback. We agree that streamlining the process of registering new apprenticeship programs is a priority. Pennsylvania will continue to prioritize this goal.
19	PA Workforce Development Association	<p>As the association to Pennsylvania's 22 Local Workforce Development Boards and various workforce system providers and partners, Pennsylvania Workforce Development Association is providing public comments on the draft of the 2024-2028 Workforce Innovation and Opportunity Act (WIOA) State Plan for Pennsylvania.</p> <p>Governor Shapiro's 2024-2028 state plan outlines six essential goals for the improvement of Pennsylvania's workforce system. The following includes comments regarding each goal:</p> <p>Goal 1: Apprenticeship and Career & Technical Education</p> <p>We commend the Governor for prioritizing earn and learn models specifically registered apprenticeship and pre apprenticeship programs, but we encourage the state workforce plan to prioritize streamlining the registration process and diversifying the model for registered apprenticeship and pre-apprenticeship programs. It must be acknowledged that a slow and inflexible system is discouraging employers from registering their apprenticeship programs and that the traditional registration process may be inaccessible to non-traditional apprenticeship models.</p> <p>Additionally, an apprenticeship model serves as a tool in the talent toolbox of employers – proven models of regional intermediaries that offer technical assistance, guidance and support is critical to re-design and sustain the traditional talent</p>	<p>Thank you for your feedback.</p> <p>The PA WDB maintains a standing committee on Apprenticeship and Career & Technical Education that regularly meets regularly and includes membership representing multiple workforce development agencies and local workforce development partners.</p> <p>The PA Apprenticeship and Training Office's Pre-Apprenticeship Division expanded its work in 2023, and will expand its staff in early 2024. Pre-apprenticeship program priorities were refocused during the year due to the implementation of Act 158, raising heightened consideration for existing and new programs specifically targeting youth. Act 158: Pathways to Graduation allows for successful completion of a pre-apprenticeship program as a potential alternative assessment pathway to the Keystone Exams. The ATO further strengthened the relationship between the Department of Labor & Industry (L&I) and the</p>

		<p>development pathways to quality ‘earn and learn’ activities.</p> <p>The bridge from Career & Technical Education (CTE) to Apprenticeship is one that should be strengthened and invested in, for youth and young adults as well as incumbent workers. We encourage the State Workforce Development Board to break down agency silos and improve coordination amongst Departments to align education and apprenticeship standards, practices, and technical assistance for CTE providers and Apprenticeship programs.</p>	<p>Pennsylvania Department of Education (PDE) with cross-agency collaborative presentations between the Pre-Apprenticeship Division at the Integrated Learning Conference, Apprenticeship Expo, and SAS Institute. Beginning the 2024 school year, the Pre-Apprenticeship Division was included in the Career Ready PA REBoot Camp – a statewide series of trainings designed by the Career Ready PA Coalition for educators across the Commonwealth to learn about career readiness for their students while gaining Act 48 credits. These trainings reached a total of 130 districts and 235 participants. The ATO’s increased partnerships with Career and Technology Centers (CTCs) statewide resulted in a total registration of 45 more Pre-Apprenticeship Programs either sponsored by or affiliated with CTCs.</p>
20	PA Workforce Development Association	<p>Goal 2: Sector Strategies and Employer Engagement</p> <p>Pennsylvania has a long-standing history in sector strategies and industry partnerships; that tenured expertise must be used to continuously innovate system and local approaches to best serve employers. We encourage the state plan to prioritize, invest, and innovate around local and regional employer engagement strategies that best leverage PA CareerLink® and the local workforce development system. In addition, we ask the State Workforce Development Board to assess ways that state agencies can improve coordination and alignment with each other and within economic development and workforce development policies, priorities, and funds that support the talent development needs of Pennsylvania employers, targeted</p>	<p>Thank you for your feedback.</p> <p>The PA WDB maintains a standing committee on Sector Strategies and Employer Engagement that regularly meets regularly and includes membership representing multiple workforce development agencies and local workforce development partners.</p>

		industries, and occupations.	
21	PA Workforce Development Association	<p>Goal 3: Youth</p> <p>While the plan demonstrates a commitment to prioritizing services for youth workforce development in Pennsylvania, the plan lacks explicit information on resource allocation, raising questions about budgetary considerations and sustainability of youth programming in Pennsylvania. Additionally, in reference to evidence-based quality summer programs, we encourage the plan to engage with local subject matter experts operating summer programming to inform a state “framework” and establish an appropriate system of support and technical assistance, including access to data that is appropriately shared with the local system for programming purposes. Lastly, the plan relies on collaboration among various state agencies and offices, we encourage consistent inclusion of local workforce development boards, and their subsequent youth committees to determine appropriate approaches to youth programming at the local level.</p>	<p>The standing Youth Committee with the PA WDB will continue to prioritize these issues. That committee includes members of local workforce development boards.</p> <p>WIOA Youth funding allocations are driven by federal formulas and are articulated in the state plan under Section 5 A (i).</p> <p>Workforce provides local workforce development boards funding under the Business Education Partnership Program to collaborate with school districts and local businesses and to educate students, parents and guardians about high-priority occupations and in-demand career pathways that are available to students as they enter the workforce.</p> <p>Further, the Pennsylvania Outdoor Corps offers paid work experience, skills training, professional development, and environmental educational opportunities to youth and young adults who complete recreation and conservation projects on Pennsylvania’s public lands</p>
22	PA Workforce Development Association	<p>Goal 4: Continuous Improvement of the PA CareerLink®</p> <p>PA CareerLink® centers provide standing access to services for individuals that need in-person support or otherwise have barriers to remote access such as digital literacy. We strongly</p>	<p>Thank you for your comment.</p> <p>The PA WDB supports sharing data with locals where legally allowable.</p>

		<p>ask the State Workforce Board to prioritize and invest in modern approaches to customer access and outreach efforts that utilizes technology, data analysis, community-partnerships, and innovative approaches to bring services to customers inside and outside of physical PA CareerLink® centers. We ask the state to explore methods and incentives for no-wrong door approaches across the workforce eco-system, expand the identity of PA CareerLink® across community-access points throughout the Commonwealth and partner with local workforce development boards in determining equitable assessment of service delivery and overall impact of local programming.</p> <p>Additionally, the plan outlines a clear desire for quality programming within the system and to maintain accurate documentation and assessment of progress. To aid in this effort, we encourage the state to prioritize data access and strategic analysis for local boards to do real-time program and policy evaluation.</p> <p>If Pennsylvania is to have a workforce development ecosystem that best serves students, jobseekers, workers, employers, and our communities, then workforce professionals must have access to sustained leadership development, professional development, capacity building and technical assistance to have the knowledge, skills, and abilities to effectively perform their duties with success. The WIOA Title II program is a nationally recognized model for staff leadership and we encourage the Department of Labor & Industry to design and implement a system of professional support for local workforce professionals based on the expertise and approach of its sister agency the Department of Education.</p>	<p>Through its website, in-person Labor Market Information Forums, and distribution networks, L&I provides a breadth of information highlighting state and local labor market data and performance metrics. L&I also provides administrative unemployment compensation data when appropriate via data sharing and confidentiality agreements.</p> <p>Pennsylvania has awarded four rounds of funding to support digital literacy skills in Pennsylvania. L&I's digital-literacy grant provides funding to organizations in local communities that teach residents how to effectively navigate platforms used in the job search process and the workplace, including digital fundamentals, digital citizenship, and understanding digital information – especially in communities lacking access to broadband infrastructure and high-speed internet.</p> <p>Digital Intake : Launched the PA CareerLink® Digital Intake Form Last year the Commonwealth prioritized using technology to streamline intake and service delivery to WIOA program participants. Since then, the</p>
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			<p>of interest to users. SkillUp™ PA benefits users at different points along their career journey – including unemployed job seekers, dislocated workers, and currently employed individuals. The overarching goal for L&I is to ensure that underserved and disadvantaged residents can access all public workforce services and thrive in a new and emerging economy dependent on digital access, literacy, and interconnectivity.</p> <p>Staff Development: As a result of surveys and initiatives started in 2022, training remains a priority in 2024. As L&I continues cultivating a dynamic public workforce development system for Pennsylvania residents, a human-centric approach will be employed to operationalize internal and external training needs. In 2024, we anticipate the implementation of the following:</p> <ul style="list-style-type: none">• Internally, there remains a need to enhance the professional development of L&I staff in the one-stop centers. Through collaboration with PWDA in 2022, recommendations have been provided that will be further explored on restructuring training and staff credentialing.• L&I Office of Transformation and
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			<p>a comprehensive training on Registered Apprenticeship and Pre-apprenticeship to PA CareerLink® Staff, offered through a full one-day, onsite, Professional Development Day (PDD) resulting in reaching some 30 PA CareerLink® Offices and over 500 workforce development staff to date. This PDD is geared to provide information to workforce staff including Workforce Development Boards, CareerLink® leadership and frontline staff on the ways to best interact and engage with job seekers, employers and the ATO. The ATO provides guidance and resources to introducing Apprenticeship and Pre-Apprenticeship to engage employers and jobs seekers as well as the benefits and information on how apprenticeship is one of the most effective strategies for engaging employers and increasing performance outcomes for the public workforce system. Apprenticeship programs can help states and local areas meet their targets on the Workforce Innovation and Opportunity Act (WIOA) primary indicators.</p> <p>Through an Apprenticeship Building America (ABA) grant, the ATO has also partnered with 10 local workforce development boards (LWDBs) in their efforts to expand RA and Pre-RA opportunities among underrepresented</p>
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			<p>populations in their respective regions. As part of this work, the ATO has helped each LWDB develop or enhance an actionable Apprenticeship Strategic Plan for their workforce development area that also informs their WIOA Local and Regional Plans.</p> <p>The PA WDB will continue to explore recommendations around system improvement to continuously improve all elements of service delivery to workforce customers by incorporating technology solutions where appropriate.</p>
23	PA Workforce Development Association	<p>Goal 5: Barrier Remediation</p> <p>We encourage the state to prioritize data collection and information sharing with local workforce boards to better assess program effectiveness with an equitable lens for the benefit of individuals with a barrier to employment and for all customers. Access to unemployment claimant, unemployment wage, and new hire data for local workforce development boards will provide the essential information local boards need to improve their service delivery for their customers.</p> <p>Diversity, equity, inclusion and accessibility are noted throughout the plan; however we ask the State Workforce Development Board to craft a DEI-A equity framework or similar approach that can best inform state and local plans, programs, and investments. The Pennsylvania Department of Education may be a key partner to the Board in understanding sub-population demographics, data analysis, and DEI-A centered policies to support vulnerable populations in need of workforce</p>	<p>Thank you for your feedback.</p> <p>The PA WDB supports sharing data with locals where legally allowable.</p> <p>Through its website, in-person Labor Market Information Forums, and distribution networks, L&I provides a breadth of information highlighting state and local labor market data and performance metrics. L&I also provides administrative unemployment compensation data when appropriate via data sharing and confidentiality agreements.</p> <p>The PA WDB will explore how it can take a more active role in the development of</p>

		<p>development services and supports.</p> <p>The workforce, education, and training programs outlined in the Plan may or could often serve common customers. Local programs are often faced with the task and bureaucracies to navigate multiple agency rules, systems, databases, preferences, and approaches to braid eligibility, funding, services, and compliance when serving a single customer. Local staff must have a better understanding of the barrier remediation ‘playbook’ to cross-walk what’s allowed, what’s not allowed and leverage WIOA, Wagner-Peyser, TANF, Perkins, SNAP, TAA, JVSG, Job Corps, CBSG, UC, SCEP, REO programs, etc. We encourage the State Workforce Development Board to fully assess the WIOA Combined Plan programs for state policy and program approaches that maximize local flexibility for program eligibility, co-/dual-enrollment, needs assessments, leverage training and supportive services funds, promote efficient case management, lessen the burden of local staff performing administrative and duplicate tasks, and promote performance improvement through data access and analysis.</p> <p>We ask that if the State anticipates or expects a change in who is being served related to the goal of barrier remediation, the state should, with some evidence, incorporate priorities within the Plan and embed strategies and data-informed approaches into their performance negotiations with ETA and local workforce areas.</p> <p>Lastly, the state plan outlines a need for improvement regarding “Incorporating regional partnerships to address shared challenges through collaborative solutions in common labor markets inclusive of multiple Local Workforce Development Areas.” We ask the State Workforce Board to consider the following: “Incorporating regional partnerships to address</p>	<p>DEI-A programs across state agencies active in workforce development.</p> <p>The PA WDB will continue to prioritize the importance of opportunities for knowledge sharing with local staff to provide them with the best resources to serve customers in the best way possible.</p>
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		shared <i>interests and</i> challenges through <i>administrative and</i> collaborative solutions in common labor markets inclusive of multiple Local Workforce Development Areas.”	
24	PA Workforce Development Association	<p>Goal 6: Addressing Workforce Shortages in Critical Industries Employer engagement with the workforce system is essential to addressing the workforce shortages among the critical industries outlined in the state plan. Local workforce development boards are the experts in their local economies and local employer needs throughout the state. We encourage the state to support local workforce development boards in determining the appropriate connection of employers in these critical industries to the workforce system.</p> <p>Additionally, the development of career pathways to these critical industries must become easily navigable regarding the credentialing needs of employment opportunities and the training services available. We encourage the collaboration of state agencies to map out credential and career pathways for critical industries and to evaluate a diversity of models for education and workforce training.</p> <p>The Pennsylvania State Workforce Board has the unique position to convene all state agencies around workforce development policy and the continuous improvement of the workforce system. This collaboration and coordination of effort will be essential to achieving the Governor’s six goals of the state plan. We encourage the state workforce board to capitalize on this unique position and be intentional in the collaborative efforts among agencies and local workforce development boards and PA CareerLink® subject matter experts.</p> <p>We appreciate the opportunity to offer insights and recommendations that align with the interests and needs of</p>	<p>Thank you for your feedback.</p> <p>The PA WDB continues to convene members from all WIOA core and partner agencies on a monthly basis to discuss topics related to workforce development. Additionally, the PA WDB currently convenes 11 committees on a variety of topics related to workforce development priorities in the commonwealth. Membership on these committees includes both local WDB staff and PA CareerLink® staff.</p> <p>Increased staff has allowed the PA Apprenticeship and Training Office’s (ATO) field team to more proactively and strategically work to grow apprenticeships across PA, including an increased focus on sector strategies. In the coming year, the ATO will make available targeted "Mini-grants" that will support the growth of new programs in specific sectors. They will also encourage the recruiting from populations that are traditionally underserved through RA, helping ensure that new apprenticeship opportunities are available to all Pennsylvanians. Some of the beginning sector concentrations will be in healthcare,</p>

		<p>Pennsylvania's workforce system. Thank you for considering the above comments.</p>	<p>agriculture, education, and technology, and the ATO has assigned specific ATRs to lead this work who will be consulting with Subject Matter Experts (SMEs) to determine what occupations are most in need and gather standard information needed to build successful apprenticeship programs in those occupations. The ATO has already involved some PATC members in this process (specifically related to healthcare), and is interested in hearing from other SMEs with an interest in being involved in this sector-focused work.</p> <p>Sector-focused progress is already being made. To address the significant teacher shortage in Pennsylvania, for example, the Building and Supporting a Certified Teacher Registered Apprenticeship Program in Pennsylvania initiative made up to \$400,000 in funding available to a consulting organization or individual to develop a program framework and template for a Certified Teacher registered apprenticeship. This initiative, led by the ATO and BWDA in partnership with PDE, will allow local education agencies (LEAs) to build a pipeline of well-prepared teachers, with an emphasis on subject areas most impacted by local staffing shortages. The goal is for the framework to be</p>
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			<p>replicated and tailored by LEAs to address specific regional needs. The application deadline for this grant was September 15 and awards are expected to be announced in early 2024. The Childcare Apprenticeship Initiative, another sector-specific program, is currently in the planning stages to expand Childcare and Early Learning Registered Apprenticeships across the state to continue addressing this barrier to the workforce. The goals are to increase the number of childcare workers, assure they are earning living wages, and serve the childcare needs of families participating in other registered apprenticeship programs.</p>
25	PA Association for the Education of Young Children	<p>The Pennsylvania Association for the Education of Young Children (PennAEYC) is a statewide, non-profit membership organization of over 3,000 early childhood care and education professionals. As the Pennsylvania affiliate of the National AEYC, we strive to be an effective voice for high-quality early childhood care and education through policy development, advocacy and professional development and supports for early childhood professionals. On behalf of PennAEYC, I would like to thank you for the opportunity to offer comment on Pennsylvania's 2024-2028 Workforce Innovation and Opportunity Act Combined State Plan draft published on December 16, 2023.</p> <p>PennAEYC is a principal partner organization in the Start Strong PA advocacy campaign, the childcare campaign of the Early Learning Pennsylvania coalition. PennAEYC is writing to express our support for the draft combined state plan related to priority</p>	<p>Thank you for your feedback.</p> <p>We agree that working to address the challenges posed by inadequate access to quality childcare is critical for the Commonwealth.</p>

		<p>goal five, barrier remediation. How Pennsylvania is assisting employers to retain employees, and help workers maintain full employment, through better job quality is of interest to PennAEYC and the Start Strong PA campaign. While we agree that all employees need support in accessing high-quality childcare, Child Care Works, noted in the draft combined state plan, supports low-income parents who are working or in training or education. As part of our organization's vision, PennAEYC advocates for each and every family to have access to high-quality, affordable childcare. Unfortunately, Pennsylvania's childcare system is significantly under resourced and the subsidy program does not reimburse child care programs for the actual cost of the care they provide to children, which impacts child care availability for the workforce.</p> <p>For Pennsylvania, according to a March 2023 report from the PA Early Learning Investment Commission and Ready Nation, inadequate childcare options impose substantial and long-lasting consequences. Its effects are felt by parents, businesses, and the commonwealth's taxpayers. The top-line findings examine the economic impacts of problems in Pennsylvania's childcare system on working parents, employers, and taxpayers which show an annual economic cost of \$6.65 billion in lost earnings, productivity, and revenue. Productivity challenges affect both employers and employees:</p> <ul style="list-style-type: none"> • 56 percent of Pennsylvania parents surveyed report being late for work due to childcare struggles. • Half or more report missing full days of work, leaving work early, or being distracted at work. • More than half of parents said problems with childcare hurt their efforts at work. <p>In addition, 1 in 4 say they've been reprimanded and 18 percent have been let go or fired due to inadequate child care.</p>	
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		<p>Meanwhile, productivity problems cause Pennsylvania employers to lose \$1.52 billion annually due to childcare challenges faced by their workforce.</p> <p>It's also important to note that the childcare industry is facing workforce shortages which contribute to workforce challenges in all other industries. According to a September 2023 Start Strong PA survey, 726 programs reported nearly 2,400 open positions resulting in 934 closed classrooms and 27,572 children on waiting lists. This is only a snapshot of the 6,500 programs providing childcare services. We appreciate the inclusion of childcare throughout Pennsylvania's combined state plan and encourage the PA Workforce Development Board to continue to think about how solving the childcare crisis is part of the commonwealth's broader workforce development goals.</p> <p>We are pleased to see that Pennsylvania understands that if families don't have childcare, then families will not be able to go to work. It is clear that the childcare crisis must be fully solved at the state and federal levels in order for the workforce to have access to an affordable, high-quality childcare system.</p> <p>Thank you again for the opportunity to provide public comment. Please contact our Senior Director of Public Policy and Advocacy, Kimberly Early, at kearly@pennaeyc.org should you have any questions.</p>	
26	Partner4Work	<p>Partner4Work is submitting comments in response to the <i>PA WIOA Combined State Plan (2024-2028) Draft</i>, which was released for public comment on December 16, 2023. As the local workforce development board (LWDB) for Allegheny County and the City of Pittsburgh, Partner4Work is committed to achieving the workforce development goals established by the Governor through this combined WIOA state plan. The following are recommendations to further strengthen the</p>	<p>Thank you for your feedback.</p> <p>We agree that streamlining the process of registering new apprenticeship programs is a priority. Pennsylvania will continue to prioritize this goal.</p> <p>Pennsylvania provides and allocation of</p>

		<p>capacity of Pennsylvania’s workforce development system to deliver on these goals and priorities.</p> <p>Goal 1: Apprenticeship and Career & Technical Education: Partner4Work commends the Governor for prioritizing registered apprenticeship (RA) and pre-apprenticeship (Pre-RA), including expanding these training models to additional in-demand industries and to more diverse populations of Pennsylvanians. Partner4Work shares this priority and, in the past year, has worked with the PA Apprenticeship & Training Office (ATO) and local partners to develop registered apprenticeships in sectors such as healthcare and technology. Our experience in developing apprenticeships has come with challenges and delays. This has included an approval process that values seat time over competency⁶. Competency based models are often more appropriate for apprenticeships in emerging occupations like those in tech and healthcare, where skill demands evolve rapidly and employers need a workforce ready to adapt to new technologies. Apprenticeships are inherently employer driven; competency models allow those employers to apply training where it is most beneficial and do not require lowering standards of learning.</p> <p>Partner4Work recommends that Goal 1.1 (increasing the number of RAs and Pre-RAs, “including in non-traditional occupations and new apprenticeship sectors”) should also include a commitment to minimizing barriers to participation for employers in non-traditional apprenticeship occupations or sectors. This should include establishing a more expeditious apprenticeship registration process that considers competency-based apprenticeship models in addition to the preference for seat-time based models.</p>	<p>\$25M annually to local workforce development boards for TANF Youth Development Programs to support eligible youth with an emphasis on summer internships.</p> <p>The Schools to Work Grant opportunities have made it possible for schools and entities to create new Pre-Apprenticeship programs over the past four years. The focus of the STW Grant is to establish career pathways that will enable our youth to obtain employment that offers family sustaining wages and benefits, without incurring a burden of debt. Entities are encouraged to focus on establishing Pre-Apprenticeships that focus on High Priority Occupations (HPO) and new new-sector occupations in apprenticeship and develop the skills of traditionally underrepresented groups and those with barriers to employment, as outlined in Executive Order 13985 Advancing Racial Equity and Support for Underserved Communities. These programs are designed around career pathways that successfully bridge the gap between high school and employment or post-secondary education and ensure that students have the basic skills required to pass entry exams for apprenticeship programs.</p>
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⁶ See initial PATC [rejection](#) of *FortyX80 Inc, Cyber Security Support Technician* (02/09/2023)

		<p>Additionally, RA and Pre-RA programs present an excellent opportunity for youth and young adults in Pennsylvania to receive training and enter diverse career pathways with limited to no student debt.</p> <p>While Goal 3.1 in the plan makes increasing RA and Pre-RA opportunities for youth a priority, the plan lacks detail on how the Commonwealth will ensure dedicated, sustainable funding is available to support these programs for youth. Partner4Work recommends that Goal 3.1 (“...increase opportunities for youth to engage in registered apprenticeship and pre-apprenticeship...”) should include a commitment from the Commonwealth to develop a dedicated funding strategy to advance these efforts.</p>	<p>The majority of new programs the Apprenticeship and Training Office (ATO) helped register over the past year were in new sectors, further expanding the apprenticeship model beyond the building trades. Some new sector apprenticeships registered in 2023 include: Cosmetologist, Application Developer, Arborist, Wastewater Systems Operator, Peer Specialist, Youth Development Practitioner, Digital Marketer, Dairy Herd Manager, Cybersecurity Support Technician, Prototype Model Maker, Sourcing Recruiter, and IT Generalist. These sectors are growing fast. For example, 8% of healthcare RAs, 26% of technology RAs, and 25% of agriculture RAs were registered over the past year alone. Apprentices in new sectors also grew rapidly over the past year. While the number of apprentices in the Building Trades and Manufacturing grew 21% and 30% respectively, the number of healthcare apprentices increased 86%, agricultural apprentices increased 120%, and education apprentices by an extraordinary 750%.</p> <p>In support of expedited the growth of new sector apprenticeships further: In the coming year, the ATO will make available targeted "Mini-grants" that will</p>
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			<p>support the growth of new programs in specific sectors. They will also encourage the recruiting from populations that are traditionally underserved through RA, helping ensure that new apprenticeship opportunities are available to all Pennsylvanians. Some of the beginning sector concentrations will be in healthcare, agriculture, education, and technology, and the ATO has assigned specific ATRs to lead this work who will be consulting with Subject Matter Experts (SMEs) to determine what occupations are most in need and gather standard information needed to build successful apprenticeship programs in those occupations.</p>
27	Partner4Work	<p>Goal 2: Sector Strategies and Employer Engagement: Partner4Work supports the Commonwealth's emphasis on sector strategies and employer engagement to ensure workforce development resources are aligned to meet the skills and hiring demands of Pennsylvania's employers. We encourage the state plan to prioritize, invest, and innovate around local and regional employer engagement strategies that best leverage PA CareerLink® and the local workforce development system.</p> <p>Funding for industry partnerships (IPs), however, decreased in the Commonwealth budget by \$2 million (-42%) between the (2019-2020) and (2020-2021) state budgets. This funding has since remained stagnant at \$2.8 million for the past four years. In addition, current IP grants from the PA WDB are designed to fund projects within individual workforce development areas. A</p>	<p>Thank you for your feedback.</p> <p>Governor Shapiro agrees in the value of Industry Partnerships, indicated by his request for an increase in funding for the Industry Partnership grant program in his 2024 budget proposal.</p> <p>The PA WDB is committed to exploring the possibility of larger maximum grant awards for regionally based partnerships.</p> <p>Management Directive 310.3 waives the lapsing requirements for grant funding. This means that Industry Partnerships</p>

		<p>regional application for IP funding, coordinated among multiple LWDBs, would be limited to the same maximum grant amount as an application from a single LWDB. Funds are also single year funding, which makes long-term planning difficult.</p> <p>Partner4Work recommends that Goal 2.1 (“continue to promote Industry Partnerships by providing grant funding...”) should include a commitment to increasing state-level investment in IPs. The PA WDB should also revise its IP investment strategy in a way that values rather than disincentivizes regional industry partnerships. This should include establishing a higher maximum grant amount for IP applicants applying as a region versus applications from a single LWDB. This should also include multi-year funding that would enable long-term planning and partnership development with regional employers.</p>	<p>will be granted for the full period of performance without annual delays from waivers. This will allow for continuity on IP projects.</p>
28	Partner4Work	<p>Goal 3: Youth</p> <p>While the draft state plan demonstrates a commitment to prioritizing services for youth workforce development in Pennsylvania, the plan lacks explicit information on resource allocation, raising questions about budgetary considerations and sustainability of youth programming in Pennsylvania. As a key example, the state plan emphasizes the importance of coordination between WIOA and Pennsylvania’s TANF Youth Development Program (YDP) to improve services and outcomes for youth. Though, the plan does not address recent proposed changes to federal regulations⁷ that place TANF-funded youth workforce development programming at risk. Partner4Work recommends that the state plan should address, in light of the proposed regulatory changes to TANF, Pennsylvania’s strategy for ensuring continued funding and resources beyond WIOA are available to support workforce development programming for</p>	<p>Thank you for your feedback.</p> <p>The standing Youth Committee with the PA WDB will continue to prioritize these issues. That committee includes members of local workforce development boards. Any work done by the Youth Committee, including work related to evaluating evidence-based quality programming will include local workforce development input.</p> <p>Pennsylvania will continue to monitor the proposed regulatory changes to TANF to determine what steps need to</p>

⁷ Notice of Proposed Rulemaking: Strengthening Temporary Assistance for Needy Families (TANF) as a Safety Net and Work Program (10/02/2023)

		<p>low-income youth and youth with additional barriers to employment in Pennsylvania.</p> <p>Additionally, in reference to evidence-based quality summer programs, we recommend engaging local subject matter experts operating summer programming to inform a state “framework” and establish an appropriate system of support and technical assistance, including access to data that is appropriately shared with the local system for programming purposes. Lastly, the plan relies on collaboration among various state agencies and offices; we recommend consistent inclusion of LWDBs and their subsequent youth committees to determine appropriate approaches to youth programming at the local level.</p>	be taken.
29	Partner4Work	<p>Goal 4: Continuous Improvement of PA CareerLink®</p> <p>The draft state plan sets goals to increase access to PA CareerLink® services through methods such as expanding virtual service delivery, improving outreach to special populations, and improving service coordination and data/information sharing among agency partners.</p> <p>The Commonwealth should consider ways in which data/information sharing can streamline the PA CareerLink® eligibility determination process for certain programs. For instance, to verify participant eligibility, prospective WIOA participants are currently required to submit information that has already been verified by other state agency staff and stored in existing state data systems. Examples include unemployment compensation (UC) status available through state UC records and low income status available through the PA public assistance records (e.g. COMPASS). This creates duplication of effort across Commonwealth staff and grantees and can also lead to frustrated customers required to provide the same information multiple times. In “promoting better data sharing</p>	<p>Thank you for your feedback.</p> <p>The PA WDB supports sharing data with locals where legally allowable.</p>

		<p>across workforce programs” (Goal 4.9), Partner4Work recommends that the Commonwealth ensure that LWDBs and provider-level staff are able to access relevant data that exists in state systems to improve processes and outcomes for our customers.</p> <p>Additionally, the plan outlines a clear desire for quality programming within the system and to maintain accurate documentation and assessment of progress. To aid in this effort, we encourage the state to prioritize data access and strategic analysis for LWDBs to do real-time program and policy evaluation.</p>	
30	Partner4Work	<p>Goal 5: Barrier Remediation</p> <p>We encourage the Commonwealth to prioritize data collection and information sharing with local workforce boards to better assess program effectiveness with an equitable lens for the benefit of individuals with a barrier to employment and for all customers. Access to unemployment claimants, unemployment wage, and new hire data for local workforce development boards will provide the essential information local boards need to improve their service delivery for their customers.</p> <p>The workforce, education, and training programs outlined in the draft state plan may or could often serve common customers. Local programs are often faced with the task and bureaucracies to navigate multiple agency rules, systems, databases, preferences, and approaches to braid eligibility, funding, services, and compliance when serving a single customer. Local staff must have a better understanding of the barrier remediation ‘playbook’ to crosswalk what is allowed, what is not allowed and leverage WIOA, Wagner-Peyser, TANF, Perkins, SNAP, TAA, JVSG, Job Corps, CSBG, UC, SCEP, REO programs, etc. We encourage the PA WDB to fully assess the WIOA Combined Plan programs for state policy and program</p>	<p>Thank you for your feedback.</p> <p>We have updated the statement in the plan to include the proposed additional language on page 21 of the Combined State Plan.</p> <p>The PA WDB supports sharing data with locals where legally allowable.</p> <p>Additionally, as part of an effort to improve Pennsylvania’s workforce system policy writing and policy life-cycle management, L&I has published and implemented a workforce system Policy on Policies. Those governed by the document are working to ensure better alignment with federal and state law, published regulation, and issued federal guidance (e.g., TEGL 23-19 Change 1).</p>

		<p>approaches that maximize local flexibility for program eligibility (including ensuring state policy on the use of self-attestation for WIOA eligibility is better aligned with the more flexible federal guidance⁸), co-/dual-enrollment, and needs assessments; leverage training and supportive services funds; promote efficient case management; lessen the burden of local staff performing administrative and duplicate tasks; and promote performance improvement through data access and analysis.</p> <p>Lastly, the state plan outlines a need for improvement regarding “Incorporating regional partnerships to address shared challenges through collaborative solutions in common labor markets inclusive of multiple Local Workforce Development Areas.” We ask the PA WDB to consider the following: “Incorporating regional partnerships to address shared interests and challenges through administrative and collaborative solutions in common labor markets inclusive of multiple Local Workforce Development Areas.”</p>	
31	Partner4Work	<p>Goal 6: Addressing Worker Shortages in Critical Industries Partner4Work supports the addition of a category of goals focused on addressing worker shortages in key industries in Pennsylvania. As the LWDB, Partner4Work continuously works with our industry partners to address hiring challenges and bridge skills gaps between job seekers and available jobs.</p> <p>Our organization agrees that increasing “youth awareness of opportunities in critical industries through programs that serve in- and out-of-school youth” (Goal 6.8) is vital to ensuring Pennsylvania’s pipeline of young talent are prepared to enter careers pathways available in these industries. Partner4Work recommends that the Commonwealth should utilize its 22 LWDBs across Pennsylvania to coordinate and work more</p>	<p>Thank you for your feedback.</p> <p>The PA WDB continues to convene members from all WIOA core and partner agencies on a monthly basis to discuss topics related to workforce development. Additionally, the PA WDB currently convenes 11 committees on a variety of topics related to workforce development priorities in the commonwealth. Membership on these committees includes both local WDB staff and PA CareerLink® staff.</p>

⁸ USDOL - TEGL 23-19, Change 1

		<p>closely with schools to provide meaningful career exploration and education to K-12 students. This coordination would ease the burden on businesses as well, who could have a single point of contact in local workforce areas rather than working with each individual school. Additional flexible funding would likely be required to support this work. LWDBs main sources of youth workforce funding limit our ability to reach younger students due to age requirements for WIOA (ages 14-24) and Temporary Assistance for Need Families (TANF) funding (ages 12-24). Both of these funding streams require individual participant eligibility, which makes systemic work impractical with either funding stream.</p> <p>Additionally, the development of career pathways to these critical industries must become easily navigable regarding the credentialing needs of employment opportunities and the training services available. We encourage the collaboration of state agencies to map out credential and career pathways for critical industries and to evaluate a diversity of models for education and workforce training. This should include adopting a shared definition of “industry-recognized credential” and other shared terms across L&I, PDE, DCED, and other applicable agencies.</p> <p>The PA WDB has the unique position to convene state agencies around workforce development policy and the continuous improvement of the workforce system. This collaboration and coordination of effort will be essential to achieving the Governor’s six broad goals of the state plan. We encourage the state workforce board to capitalize on this unique position and be intentional in the collaborative efforts among agencies, LWDBs, and PA CareerLink® subject matter experts.</p> <p>Thank you for the opportunity to provide comments on the PA</p>	<p>The PA WDB will explore the possibility of making workforce development funding more flexible, particularly with respect to youth funding.</p> <p>The PA WDB will explore the possibility of developing a shared definition of “industry recognized credential” to be used across the workforce development system.</p> <p>Business Education Partnership (BEP) grants allow LWDBs to foster collaborations among businesses and school districts to create career programs with exposure to different workplace opportunities and knowledge of opportunities in the Commonwealth of Pennsylvania for the purpose of employing individuals in a HPO or PA In-Demand Occupation (PA IDOL) and meeting the workforce needs of businesses. These projects connect employers, students, parents, and guardians to share information about career pathways opportunities that lead to family sustaining wages in PA and teach career ready skills. Engage businesses to create opportunities for early career exposure and exploration, as well as the development of employability skills through work-based learning experiences, particularly through summer employment and STEM career</p>
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		<p>WIOA Combined State Plan (2024-2028) draft. Please reach out to dmoore@partner4work.org with any questions.</p>	<p>pathways. Develop and implement outreach initiatives to under-represented students, parents, and guardians through innovative practices that promote equity.</p> <p>The Schools to Work Grant opportunities have made it possible for schools and entities to create new Pre-Apprenticeship programs over the past four years. The focus of the STW Grant is to establish career pathways that will enable our youth to obtain employment that offers family sustaining wages and benefits, without incurring a burden of debt. Entities are encouraged to focus on establishing Pre-Apprenticeships that focus on High Priority Occupations (HPO) and new new-sector occupations in apprenticeship and develop the skills of traditionally underrepresented groups and those with barriers to employment, as outlined in Executive Order 13985 Advancing Racial Equity and Support for Underserved Communities. These programs are designed around career pathways that successfully bridge the gap between high school and employment or post-secondary education and ensure that students have the basic skills required to pass entry exams for apprenticeship programs.</p> <p>The Apprenticeship and Training Office (ATO) and L&I was one of 30 initial</p>
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			<p>recipients nationwide who was awarded grant funding through the U.S. Department of Labor's 2022 ABA initiative. The \$3.9 million grant will support at least 400 apprentices and 400 pre-apprentices in PA over four years. In 2023, the ATO partnered with 10 local workforce development boards (LWDBs) in their efforts to use these funds to expand apprenticeship and pre-apprenticeship opportunities among underrepresented populations in their respective regions. As part of this work, the ATO has helped each LWDB develop or enhance an actionable Apprenticeship Strategic Plan for their workforce development board area that also informs their WIOA Local and Regional Plans. In addition, the ATO helped LWDBs engage Career and Technical Centers (CTCs) within their areas to develop plans for Pre-RA to RA pipelines, and has supported LWDBs as they provide technical assistance around the development of new RA and Pre-RA programs.</p> <p>Since implementing the PAsmart initiatives in 2018, L&I has invested over \$28 million in PAsmart funding statewide to support 124 projects in the accommodation and food service, agriculture, forestry, fishing, and hunting, professional and business</p>
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			<p>services, early childhood development, education, electric power generation, healthcare and social assistance, information technology, animal production, administrative and support services, transportation, building and construction, and manufacturing sectors. As a direct result of PAsmart funding, 85 new pre-apprenticeship and 102 new apprenticeship programs have been created, reaching a total of 2,116 apprentices and 2,110 pre-apprentices across the Commonwealth through grant-funded initiatives. Additionally, 3,926 employers and 1,565 training providers have been engaged through PAsmart.</p>
32	Trying Together	<p>Thank you for the opportunity to submit public comments for the 2024-2028 WIOA Combined State Plan Draft.</p> <p>Trying Together is writing to express our support for the draft combined state plan related to priority goal five, barrier remediation. How Pennsylvania is assisting employers to retain employees, and help workers maintain full employment, through better job quality is of interest to Trying Together and the Start Strong PA campaign. While we agree that all employees need support in accessing high-quality childcare, Child Care Works as noted in the draft combined state plan, supports low-income parents who are working or in training or education. As part of our organization's vision, Trying Together advocates for all families to have access to high-quality, affordable childcare. Unfortunately, Pennsylvania's childcare system is significantly under-resourced and the subsidy program does not reimburse childcare programs for the actual cost of</p>	<p>Thank you for your feedback.</p> <p>We agree that working to address the challenges posed by inadequate access to quality childcare is critical for the Commonwealth.</p>

		<p>the care they provide to children which impacts childcare availability for the workforce.</p> <p>For Pennsylvania, according to a March 2023 report from the PA Early Learning Investment Commission and Ready Nation, inadequate childcare options impose substantial and long-lasting consequences. Its effects are felt by parents, businesses, and the commonwealth's taxpayers. The top-line findings examine the economic impacts of problems in Pennsylvania's childcare system on working parents, employers, and taxpayers which show an annual economic cost of \$6.65 billion in lost earnings, productivity, and revenue.</p> <p>Productivity challenges affect both employers and employees:</p> <ul style="list-style-type: none"> • 56 percent of Pennsylvania parents surveyed report being late for work due to childcare struggles. • Half or more report missing full days of work, leaving work early, or being distracted at work. • More than half of parents said problems with childcare hurt their efforts at work. <p>In addition, 1 in 4 say they've been reprimanded, and 18 percent have been let go or fired due to inadequate childcare. Meanwhile, productivity problems cause Pennsylvania employers to lose \$1.52 billion annually due to child care challenges faced by their workforce.</p> <p>It's also important to note that the childcare industry is facing workforce shortages which contribute to workforce challenges in all other industries. According to a September 2023 Start Strong PA survey, 726 programs reported nearly 2,400 open positions resulting in 934 closed classrooms and 27,572 children on waiting lists. This is only a snapshot of the 6,500 programs providing childcare services. We appreciate the inclusion of</p>	
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		<p>childcare throughout Pennsylvania's combined state plan and encourage the PA Workforce Development Board to continue to think about how solving the childcare crisis is part of the commonwealth's broader workforce development goals.</p> <p>We are pleased to see that Pennsylvania understands that if families don't have childcare then families will not be able to go to work. It is clear that childcare affordability and quality must be fully solved at the state and federal levels to support the workforce.</p>	
33	PA Advocates and Resources for Autism and Intellectual Disabilities	<p>On behalf of Pennsylvania Advocates and Resources for Autism and Intellectual Disabilities (PAR), thank you for the opportunity to provide feedback on the Pennsylvania Department of Labor and Industry's (L&I) 2024-2028 Workforce Innovation and Opportunity Act (WIOA) Combined State Plan Draft. PAR is the primary statewide association dedicated to supporting organizations who support individuals with intellectual disability/autism (ID/A). PAR supports L&I's commitment to developing a thriving Pennsylvania workforce and focus on effectively and efficiently serving Pennsylvanians with barriers to employment. Below are PAR's comments on the draft plan.</p> <p>Addressing Worker Shortages in Critical Industries <i>"6.2 Address worker shortages in healthcare and long-term care industries, focusing on direct care and community health sectors, by increasing the number of qualified healthcare and long-term care professionals" (page 37).</i></p> <p>PAR appreciates the inclusion of the direct care workforce in L&I's goals to address worker shortages in critical industries. Strengthening essential support services and ensuring accessibility to crucial resources such as childcare, transportation, food, and housing is an important factor to reducing the direct care worker shortage. However, an increase</p>	<p>Thank you for your comment.</p> <p>ID/A providers are an eligible applicant of this grant.</p>

		<p>in Medicaid provider payment rates is essential to system sustainability and must occur concurrently to any other workforce initiatives.</p> <p>ID/A providers are funded almost exclusively by Medicaid. With a lack of regular increases in ID/A provider rates, the wages of direct support professionals (DSPs) have fallen behind competitors. Providers are unable to retain and recruit enough DSPs. A 2022 Provider Consortium study found that DSP turnover was at 35.7%, and 20% of DSP positions are vacant. Due to these inadequate rates, the staffing shortage continues to affect the availability of services across every program area. A survey completed in the fall of 2022 found 62% of providers are serving fewer individuals today than they were prior to the pandemic and 34% percent of providers have closed programs. These dynamics have resulted in an 11% reduction in the number of individuals served. As a result, utilization and the expenditures on services have decreased as individuals could not utilize their HCBS waivers. Without the proper funding for competitive wages, providers will not be able to keep staff from going to a different job or industry that pays more and has less responsibility. In order to truly address the direct care worker shortage, ongoing funding must be provided for wages that meet DSPs' complex job responsibilities.</p> <p>PAR would also like to encourage the reconsideration of provider eligibility for the Direct Care Worker Quality Grant. Given the objectives and purpose of the Workforce Innovation and Opportunity Act, and the acknowledgment of L&I that there are workforce shortages in the direct care space, we feel it is an oversight by L&I to not consider ID/A providers for this grant. Individuals with ID/A are continually marginalized and left behind, and we feel that this is an example of other communities given priority over those with an ID/A. PAR asks</p>	
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		that, in the future, this critical workforce be included in all direct care initiatives.	
34	PA Advocates and Resources for Autism and Intellectual Disabilities	<p>Apprenticeship and Career & Technical Education</p> <p><i>“1. Apprenticeship and Career & Technical Education: Expand opportunities for individuals to enter into Registered Apprenticeship and Registered pre-Apprenticeship programs, assist employers in building Registered pre-Apprenticeship and Registered Apprenticeship programs, and increase the coordination with Career & Technical Education in these efforts” (page 23).</i></p> <p>Apprenticeships are a wonderful tool to create a workforce that meets the demands of businesses. It is essential that people with ID/A are included in all aspects of implementation to ensure they have access to training and apprenticeship opportunities. This may require that reasonable accommodations are made to the curriculum, training, and on-the-job supports.</p> <p>Additionally, while PAR supports how the WIOA draft plan recognizes the critical importance of apprenticeships and career and technical education (CTE) programs, DSPs are often left out of these conversations. PAR urges L&I to include DSPs in these apprenticeship and CTE programs to increase awareness of the role of DSPs as a career pathway for participants.</p>	<p>Thank you for your comment. We agree that opportunities for Registered pre-Apprenticeship and Registered Apprenticeship programs should be accessible to all Pennsylvanians.</p> <p>The Apprenticeship and Training Office (ATO) continues to focus on creating more inclusive and equitable opportunities to serve individuals from populations traditionally underserved in apprenticeship. In addition to new collaborations with the PA Office of Vocational Rehabilitation requirements around assisting underserved populations are now built into every grant opportunity offered.</p> <p>The ATO is also working with the PA Office of Vocational Rehabilitation (OVR) to offer the Disability Inclusion for Apprenticeships & Pre-Apprenticeships workshop in 2024 through its Apprenticeship Building America (ABA) grant.</p>
35	PA Advocates and Resources for Autism and Intellectual Disabilities	<p>Transportation</p> <p><i>“5.8 Explore and implement ways to collaboratively support individuals for whom transportation is a barrier to employment” (page 35).</i></p> <p><i>“The lack of reliable transportation continues to be identified as the most significant barrier to both employment and employment services” (page 178).</i></p>	<p>Thank you for your feedback.</p> <p>L&I is committed to exploring opportunities to ensure that transportation barriers are eliminated wherever possible.</p>

		<p>PAR agrees that a primary obstacle facing Community Rehabilitation Providers (CRP's) in their provision of employment services is lack of accessible, reliable, and affordable transportation for individuals served. Transportation issues are a major barrier to employment for individuals both in rural areas, due to lack of public transportation, and in urban areas, due to bus lines often requiring multiple transfers, which can be inaccessible to some individuals with ID/A. Furthermore, medical or low-income transportation services often have limited hours of operation. Other transportation options, such as uber or taxis, are often not affordable for individuals without waiver funding. Lack of access to transportation limits opportunities and in some situations eliminates employment as an option completely for individuals who otherwise have the skills to maintain community employment. PAR encourages L&I to explore and implement more efforts and partnerships with local community transportation systems, bus lines, rideshare organizations, and other community resources to remove this barrier to employment.</p>	<p>OVR has begun using ride share services in a variety of settings and is further researching the ability to do so as we recognize that those services could help address an unmet need. Transportation, as indicated, remains a challenging barrier to employment for many individuals with disabilities throughout the state based on where they choose to live and the lack of other reliable options. OVR and other disability service organizations will continue to dialog with leaders at PennDOT to determine if additional options are available.</p>
36	PA Advocates and Resources for Autism and Intellectual Disabilities	<p>Funding for Long-Term Employment Supports <i>"As the [Supported Employment] case progresses, the individual's stability on the job informs the determination of the need for extended services and the timing of provision. Those who reach 80% or better independence on the job are generally considered job stable and the case is followed for 90 days to ensure the expected progression to full independence with natural supports in place" (page 193).</i></p> <p>Inadequate length and funding of long-term employment supports is an issue for many CRPs and the individuals they serve. Individuals with ID/A often cannot begin working independently at their worksite after initial training and on-boarding. PAR encourages L&I, in conjunction with other state</p>	<p>Thank you for your feedback.</p> <p>OVR provides supported employment services as defined by our Supported Employment Policy and in accordance with the Rehabilitation Act. Once a customer has achieved stabilization then the OVR case may be closed successfully. OVR and ODP have a strong statewide partnership and have created data sharing abilities within our case management systems to share data on mutual customers that should allow for increased collaboration locally for</p>

		agencies, to strengthen the long-term employment supports that individuals with significant disabilities may need to obtain and maintain competitive integrated employment.	individual customers for short-term and long-term services. If a CRP needs additional information, they should reach out to their local OVR District Office Manager to discuss any issues that they might be experiencing and to increase collaboration and communication opportunities for individual customers.
37	PA Advocates and Resources for Autism and Intellectual Disabilities	<p>Cross-Agency Collaboration</p> <p><i>"In February 2019, a joint bulletin between OVR and ODP was issued outlining referral processes for SE cases in which a customer is eligible for OVR services and waivers through ODP. OVR will continue to communicate and collaborate with these offices to provide quality SE services and provide referrals and information regarding mutual customers. OVR will provide current information and training to state offices and other entities to ensure the provision of services and extended services" (page 194).</i></p> <p>Cross-agency collaboration and coordination is an ongoing concern for CRPs and the individuals they serve. For example, many of the current support coordinators are unaware that individuals need to be referred to OVR first when they are interested in community employment services. Providers often receive referrals for employment services (dated months prior) and then need to redirect the individual and supports coordinator (SC) back to OVR, which can be another lengthy process that delays services. Providers also encounter confusion among both vocational rehabilitation counselors (VRCs) and SCs regarding the process of transferring coaching services to waiver once an individual has reached their 90 days of stability with OVR. Additional training for VRCs and SCs and collaboration on the employment process for waiver funded</p>	<p>Thank you for your feedback.</p> <p>OVR and ODP have a strong statewide connection and our case management systems share data on mutual customers to help with the coordination of services. However, both agencies have experienced significant staff turnover following the pandemic. OVR, BSE, and ODP host a transition pre-conference each year prior to the PA Transition Conference to allow local team to communicate and plan for their upcoming year of activities. OVR also meets with ODP leadership monthly and can work to reemphasize the need to cross train staff and encourage additional local collaboration. OVR was also recently awarded a \$9.9M Disability Innovation Fund (DIF) grant entitled Pathways to Partnership. This grant is specifically written to increase training and collaboration between OVR, schools, Centers for Independent Living, and ODP. Services and training will begin in</p>

		clients would help ensure timely access to employment services.	year two of the grant in 2025.
38	PA Advocates and Resources for Autism and Intellectual Disabilities	<p>Transition Services <i>“Goal 2: Increase Transition Services for Students with Disabilities - Develop summer and after school Pre-ETS programming to prepare students with disabilities for a seamless transition from secondary school to CIE” (page 180).</i></p> <p>PAR supports L&I’s development of Pre-ETS programs to help prepare students with disabilities transition from school to competitive integrated employment. However, many high school transition teachers and SCs are unaware of the OVR process. Additional training for high school transition teachers and SCs on the OVR process and services will help create a smoother and more timely transition to adult services for students with disabilities.</p>	<p>Thank you for your feedback.</p> <p>OVR and BSE have a strong statewide connection and frequently collaborate on activities. OVR, BSE, and ODP host a transition pre-conference each year prior to the PA Transition Conference to allow local team to communicate and plan for their upcoming year of activities. OVR also meets with BSE leadership routinely and can work to reemphasize the need to cross train staff and encourage additional local collaboration. OVR was also recently awarded a \$9.9M Disability Innovation Fund (DIF) grant entitled Pathways to Partnership. This grant is specifically written to increase training and collaboration between OVR, schools, Centers for Independent Living, and ODP. Services and training will begin in year two of the grant in 2025.</p>
39	PA Advocates and Resources for Autism and Intellectual Disabilities	<p>Underserved Populations <i>On page 173 of the draft plan, “people who are blind or visually impaired” and “people who are deaf or hard of hearing” are included in the list of the most underserved population.</i></p> <p>Community Rehabilitation Providers struggle to find employers willing to hire individuals with visual and hearing impairments due to lack of on-site support, resources, and limited opportunities for educating employers on how to accommodate these individuals. Regarding individuals that are deaf or hard of hearing, providers face challenges accessing interpreters for</p>	<p>Thank you for your feedback.</p> <p>OVR may only provide services while a customer's case is open, and they require services to achieve their job goal. Once the customer is employed and stable OVR would close the persons case and it is the employer's responsibility to provide reasonable accommodations under the Americans with Disabilities Act (ADA). OVR is always happy to consult on</p>

		meetings, job tryouts, and on-the-job training. Once the individual gets a job, OVR only funds the interpreter for a limited amount of time and then expects the employer to provide further interpretation services, forcing providers to provide additional interpreting services that are often inaccessible and limited. PAR encourages L&I to expand the time for providing interpreting services based on individual need.	accommodations and additional technology that could support the deaf and hard of hearing population. The Office of Deaf and Hard of Hearing is also a great resource who can consult on accommodations and the responsibilities of an employer under the ADA.
40	PA Advocates and Resources for Autism and Intellectual Disabilities	<p>14(c) Waivers <i>"Empower Individuals paid subminimum wages through 14(c) Waivers to obtain CIE" (page 167).</i></p> <p>PAR looks forward to seeing the impact of the Invest Project in assisting people with ID/A to transition to competitive integrated employment. We suggest that, in addition to OVR sharing data on the main causes of individuals remaining in 14(c) workshops, OVR share data on the successful transition of individuals and the resources that assisted these successful transitions. OVR Section 511 meeting information should also be shared with individuals' team members and Supports Coordinators to ensure OVR referrals are completed.</p>	<p>Thank you for the feedback.</p> <p>OVR looks forward to sharing information about the successful implementation of our Disability Innovation Fund (DIF) Subminimum Wage to Competitive Integrated Employment (SWTCIE) grant as the grant gets further implemented and we enroll our employer partners and customers in 2024 and 2025.</p>
41	PA Advocates and Resources for Autism and Intellectual Disabilities	<p>Recovery Efforts from Impacts of COVID-19 <i>"Since March 2020, when physical distancing protocols began in PA, issues with VR services have been exacerbated on all sides, including those who have experienced the lasting effects from COVID-19 or long-COVID, delayed VR services, disruptions to Pre-Employment Transition Services (Pre-ETS), and the lack of communication, interaction, and response for those seeking services" (page 168).</i></p> <p>While OVR is making great efforts to make services available to all interested individuals, staffing shortages at OVR District Offices leave them unable to provide the level of services needed. PAR recommends that OVR consider additional</p>	<p>Thank you for your feedback.</p> <p>The OVR State Board has recommended that OVR explore a bachelor's level position and OVR is actively working with the Office of Administration on the creation of that classification. OVR is also working with the Office of Administration on a variety of other initiatives to improve staff retention and engagement.</p>

		<p>recruitment and retention efforts.</p> <p>Thank you for your consideration of our comments.</p>	
42	PA Partnerships for Children	<p>To Whom it May Concern,</p> <p>Pennsylvania Partnerships for Children (PPC), a nonpartisan statewide advocacy organization focused on ensuring all children in Pennsylvania have the opportunity to thrive, and principal partner of the Start Strong PA campaign, is writing to express our support for the draft combined state plan related to priority goal five, barrier remediation. How Pennsylvania is assisting employers to retain employees, and help workers maintain full employment, through better job quality, is of interest to PPC and the Start Strong PA campaign. While we agree that all employees need support in accessing high-quality childcare, Child Care Works as noted in the draft combined state plan, supports low-income parents who are working or in training or education. As part of our organization's vision, PPC advocates for all families to have access to high-quality, affordable childcare. Unfortunately, Pennsylvania's childcare system is significantly under-resourced, and the subsidy program does not reimburse childcare programs for the actual cost of the care they provide to children which impacts child care availability for the workforce.</p> <p>For Pennsylvania, according to a March 2023 report from the PA Early Learning Investment Commission and Ready Nation, inadequate childcare options impose substantial and long-lasting consequences. Its effects are felt by parents, businesses, and the commonwealth's taxpayers. The top-line findings examine the economic impacts of problems in Pennsylvania's childcare system on working parents, employers, and taxpayers which show an annual economic cost of \$6.65 billion in lost earnings, productivity, and revenue. Productivity challenges affect both employers and employees:</p>	<p>Thank you for your feedback.</p> <p>We agree that working to address the challenges posed by inadequate access to quality childcare is critical for the Commonwealth.</p>

		<ul style="list-style-type: none"> • 56 percent of Pennsylvania parents surveyed report being late for work due to childcare struggles. • Half or more report missing full days of work, leaving work early, or being distracted at work. • More than half of parents said problems with childcare hurt their efforts at work. <p>In addition, 1 in 4 say they've been reprimanded, and 18 percent have been let go or fired due to inadequate child care. Meanwhile, productivity problems cause Pennsylvania employers to lose \$1.52 billion annually due to childcare challenges faced by their workforce.</p> <p>It's also important to note that the childcare industry is facing workforce shortages which contribute to workforce challenges in all other industries. According to a September 2023 Start Strong PA survey, 726 programs reported nearly 2,400 open positions resulting in 934 closed classrooms and 27,572 children on waiting lists. This is only a snapshot of the 6,476 programs providing childcare services. We appreciate the inclusion of childcare throughout Pennsylvania's combined state plan and encourage the PA Workforce Development Board to continue to think about how solving the childcare crisis is part of the commonwealth's broader workforce development goals.</p> <p>We are pleased to see that Pennsylvania understands that if families don't have access to childcare then they will not be able to go to work. Childcare affordability and quality must be fully solved at the state and federal levels to support the workforce.</p>	
43	The Hospital Healthsystem Association of Pennsylvania	<p>RE: Pennsylvania's Workforce Plan</p> <p>I would like to provide comment on behalf of The Hospital and Healthsystem Association of Pennsylvania (HAP) to the state plan outlining Pennsylvania's workforce development strategy, particularly as it relates to our health care workforce.</p>	Thank you for your feedback. We agree that improving care and strengthening the Commonwealth's healthcare workforce is critical.

		<p>HAP advocates for approximately 235 member hospitals across the commonwealth, as well as for the patients and communities they serve. HAP's member hospitals and health systems provide health services across the continuum of care and are collectively committed to improving the health of Pennsylvanians and ensuring access to high-quality, cost-effective care.</p> <p>Developing a robust and diverse health care workforce is a top priority of Pennsylvania's hospitals and health systems as they look to both serve the current needs of their communities and meet a growing need for care as the commonwealth ages.</p> <p>Pennsylvania is projected to have the worst shortfall of registered nurses in the nation by 2026 and the third worst shortfalls of nursing support staff and mental health professionals, according to a report by Mercer. In addition, persistent workforce shortages throughout the health care sector continue to compound hospitals' workforce challenges by limiting capacity and creating bottlenecks throughout the continuum of care.</p> <p>In addition to recruiting and retaining talented employees, Pennsylvania's hospitals and health systems are focused on partnering with educators and their communities to develop the next generation of health care professionals and grow care teams that reflect the diversity of the communities they serve. Examples of these partnerships include:</p> <ul style="list-style-type: none">• Recruiting students from underrepresented communities for programs that empower them to work in the hospital while receiving education, training, and individualized support to advance their careers in health care.	
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		<p>report was developed by a task force of health care professionals, clinical and administrative leaders from hospitals and health systems, and health care educators.</p> <p>You have a significant opportunity to refocus and re-evaluate the state's approach to expanding access to and improving care for Pennsylvanians. HAP stands ready to discuss specific initiatives in more detail and to be a partner in implementing a comprehensive strategy to grow and diversify the commonwealth's health care workforce.</p>	
44	Saint Joseph's Center	<p>To Whom It May Concern:</p> <p>St. Joseph's Center would like to thank The Department of Labor and Industry for the opportunity to provide feedback related to the Draft 2024-2028 Workforce Innovation and Opportunity Act (WIOA) Combined State Plan. St. Joseph's Center supports the cooperative efforts between the departments of Aging, Agriculture, Community and Economic Development, Corrections, Education, Human Services, Military and Veterans Affairs, and State in developing the Plan. St. Joseph's Center appreciates the effort to solicit input from interested parties regarding the combined state plan outlining the state's workforce development strategy that includes the six WIOA Core programs of Adult, Dislocated Worker, Youth, Wagner-Peyser, Adult Basic Education, and Vocational Rehabilitation as well the following optional programs including Career and Technical Education Programs-Perkins Act, Temporary Assistance for Needy Families Program, Trade Adjustment Assistance for Workers Programs, Jobs for Veterans State Grants Program, Senior Community Service Employment Program, Reintegration of Ex- Offenders Program, Community Services Block Grant, and Unemployment Insurance.</p> <p>As a way of background, St. Joseph's Center is an independent Catholic agency sponsored by the Congregation of the Sisters,</p>	<p>Thank you for your feedback.</p> <p>Direct Support Professionals, listed as an alternative job title under Home Health Aides (SOC 31-1121) or Personal Care Aides (SOC 31-1122) , are a 2023 High Priority Occupation (HPO) in the North Central Workforce Development Area. Given this designation, individuals from any area may be eligible for WIOA training dollars in Pennsylvania once a training program application is approved through the North Central Workforce Development Board and added to the statewide Eligible Training Provider List.</p> <p>The petition period for PY 2024 HPOs will open in April 2024 and will remain open for at least 45 days. To potentially have Direct Support Professional occupations included on all 2024 HPO Lists, we recommend working with each local Workforce Development Board to submit a petition for one or both of the</p>

		<p>Servants of the Immaculate Heart of Mary, rooted in the values of care, concern, compassion, and commitment. The Center strives to provide individuals and families who have special needs the opportunity to develop their abilities and potential to the fullest extent possible. We do this through residential, community and home-based services, outpatient therapy, maternity, family, and adoption services. St. Joseph's is committed to the provision of joyful, loving care to all whom it serves in its wide range of residential and community services to persons diagnosed with intellectual disability; and in its adoption/pregnancy and family services. St. Joseph's recognizes the inherent dignity of all people and tolerates no barriers in providing care or employment. Persons and property are treated with respect. Compassion helps us to understand the hopes and dreams of the people whom we serve. Always dedicated to the promotion of good family life and the welfare of children, St. Joseph's and its employees strive to assist individuals and families to reach their chosen goals.</p> <p>General</p> <p>St. Joseph's Center commends Governor Shapiro's vision for the workforce plan. Specifically, St. Joseph's Center supports the priority for the continuous improvement of a thriving workforce system where workers have access to stable careers with family-sustaining wages and employers have the talent they need to establish new and continue growing existing businesses while supporting communities across the Commonwealth. However, there are stable careers where organizations mainly depend on Commonwealth funding to cover expenses. St. Joseph's Center has serious concerns that the fee schedule rates paid to those agencies do not support family-sustaining wages, including those agencies who support individuals with Intellectual Disabilities or Autism (ID/A). It will be difficult to successfully implement this workforce plan without also</p>	<p>occupational titles above.</p> <p>L&I recently announced \$2.8 million in grant funding to boost the ranks of Pennsylvania's direct care workforce through improved wages and better career advancement opportunities.</p> <p>This is the second round of funding in the focused on Direct Care workers and is designed to emphasize the mutual benefits improved job quality has on direct care employers, their workers, and most importantly, the patients they serve.</p>
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		<p>investing in these careers which are mostly funded by the Commonwealth.</p> <p>Direct Support Professionals (DSPs) provide daily, hands-on support to individuals in their homes and communities. They provide critical services to individuals with ID/A and are on the front lines supporting people every day with things like gaining independence, working on achieving person-centered goals, finding jobs, personal hygiene, dressing, and activities of daily living. Direct Support Professionals are one of the main factors in the quality of life for someone with ID/A As part of this plan, DSPs should be considered a high priority occupation (HPO) in the Commonwealth. The Commonwealth cannot expect organizations to pay family-sustaining wages without also financially investing in this occupation. In addition, Agencies that support individuals with ID/A will struggle to successfully implement some of the other workforce strategies in this plan (i.e., apprenticeship, and youth programs) because the role of the DSPs is not recognized, valued, or provided enough financial support to attract workers who can earn family-sustaining wages.</p>	
45	Saint Joseph's Center	<p>Apprenticeship and Career & Technical Education</p> <p>St. Joseph's Center supports how the WIOA plan develops a comprehensive career pathways system in the Commonwealth and expands career pathways as the primary model for skill, credential, and degree attainment, with an emphasis on assisting individuals to address barriers to employment, earn a family-sustaining wage, and advance their career. St. Joseph's Center applauds how the Commonwealth recognizes the critical importance of apprenticeships and career and technical education programs (CTE) by empowering workers and potential workers to develop the knowledge, skills, and abilities that meet the needs of employers and an ever-evolving economy. However, the role of the Direct Support Professional</p>	<p>Thank you for your feedback.</p> <p>We agree that raising awareness on professional opportunities for job seekers, including opportunities as DSPs, is critical to ensuring individuals are aware of these opportunities for employment. We will continue to invest in career awareness activities across the workforce development system and welcome partnership and collaboration in these efforts.</p>

		<p>is often left out of these conversations.</p> <p>St. Joseph's Center agrees with the Commonwealth's plan to promote career and technical education programs (CTE) inclusion of employer-desired skills in the job task to better highlight that CTE participants have the skills employers want and that CTE programs are focused on developing those skills. However, St. Joseph's Center urges that the recognition and education about the role of Direct Support Professionals needs to be included in these CTE programs. The Commonwealth needs to increase awareness of the role of DSPs as a career pathway for participants and CTE programs. Organizations that support individuals with ID/A are more than willing to collaborate and engage with the Commonwealth to provide the necessary education about DSPs.</p>	<p>In February 2023, the ATO awarded funding to three LWDBs to support the convening of Nursing Pathway Apprenticeship Industry Partnerships in low- or moderate-income communities and guide the development and registration of healthcare apprenticeship programs, with an emphasis on nursing occupations, through group sponsorships. The goal is to blend the Apprenticeship and Industry Partnership models by supporting the creation of Nursing Pathway Apprenticeships using an Industry Partnership approach throughout the Commonwealth. Through these efforts, businesses will have the option to partner and form an industry partnership to build one overarching apprenticeship program serving multiple employers. This funding initiative is made possible through funding from the COVID-19 Nursing Workforce Initiative (NWI), which focuses on supporting and retaining nurses across the commonwealth as they continue to navigate numerous challenges brought on by the pandemic. The awarded LWDBs launched their initiatives locally in April and have primarily focused on the development, enhancement and convening of industry partnerships during the initial phase of their projects.</p>
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46	St. Joseph's Center	<p>Youth St. Joseph's Center supports increasing opportunities for all youth to experience work-based learning through summer employment, pre-apprenticeship, registered apprenticeship, internships, job shadowing, monitoring, and other experiences in the workplace, including developing employability skills. St. Joseph's Center understands that engaging young people early in their lifelong career journey creates a unique opportunity to help them find a successful career pathway and engage them in life-long learning.</p> <p>Through a pilot program with Pennsylvania Advocacy and Resources for Autism and Intellectual Disability (PAR) and providers that support individuals with ID/A, the Graduation to Direct Support Professional Employment (G2DSP) program provides students in high school with the opportunity to experience hands-on learning while obtaining an industry-recognized credential and helps to address the DSP workforce</p>	<p>Thank you for your comment.</p> <p>Direct Support Professionals, listed as an alternative job title under Home Health Aides (SOC 31-1121) or Personal Care Aides (SOC 31-1122), are a 2023 High Priority Occupation (HPO) in the North Central Workforce Development Area. Given this designation, individuals from any area may be eligible for WIOA training dollars in Pennsylvania once a training program application is approved through the North Central Workforce Development Board and added to the statewide Eligible Training Provider List.</p> <p>The petition period for PY 2024 HPOs will open in April 2024 and will remain open</p>

		<p>crisis. However, St. Joseph's Center has faced many barriers to successfully implementing this program.</p> <p>Concerning the barriers faced thus far in the implementation of this youth program, St. Joseph's Center continues to have difficulties with the local school districts. Some school districts have been nonresponsive to the opportunity and some have referred us to the Career Technology Center (CTC). The CTC had a tremendous amount of turnover in the educator position for the Co-Op program. In addition, the Co-op program has partnerships with larger healthcare facilities that students select for their work experience, mainly because there is a lack of understanding of the role of a Direct Support Professional. In addition, St. Joseph's Center faced the criteria for students to participate in the TANF Youth Work Experience Program and for St. Joseph's Center to receive funding. Many students who participated in the ST. Joseph's Center G2DSP program did not financially qualify to participate in that program. St. Joseph's Center was approved for seven students to be funded through that agreement, but only one of the students qualified per TANF requirements.</p> <p>In order to address some of the concerns St. Joseph's Center faced with implementing a youth program we recommend additional areas for improvement to include enhanced collaborations between the Department of Education and the Workforce Development Boards related to youth opportunities. In addition, St. Joseph's Center recommends increasing opportunities for funding youth programs that do not require TANF eligibility. Finally, St. Joseph's Center recommends education and support to have Direct Support Professionals considered a high priority occupation (HPO) and recognize their role in this plan, specifically as it relates to youth as the pipeline for this career.</p>	<p>for at least 45 days. To potentially have Direct Support Professional occupations included on all 2024 HPO Lists, we recommend working with each local Workforce Development Board to submit a petition for one or both of the occupational titles above.</p> <p>Pennsylvania is committed to continuous improvement in partnership between the Department of Education and all partners in the workforce development system, including our local Workforce Development Boards.</p> <p>L&I recently announced \$2.8 million in grant funding to boost the ranks of Pennsylvania's direct care workforce through improved wages and better career advancement opportunities.</p> <p>This is the second round of funding in the focused on Direct Care workers and is designed to emphasize the mutual benefits improved job quality has on direct care employers, their workers, and most importantly, the patients they serve.</p>
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47	St. Joseph's Center	<p><i>Strengthening the One-Stop Delivery System</i></p> <p>St. Joseph's Center supports implementing improvements to one-stop service delivery to better serve all customers, including job seekers, individuals looking to advance their careers, and employers. St. Joseph's Center understands the importance of ongoing progress in coordination among systems partners, identifying and implementing efficiencies, reducing duplication, and better customer service are all essential aspects of continuous improvement in service delivery. St. Joseph's Center will continue to be a partner and looks forward to additional opportunities to enhance service delivery for all.</p>	Thank you for your feedback.
48	St. Joseph's Center	<p>Barrier Remediation</p> <p>St. Joseph's Center supports the recognition that certain groups of Pennsylvanians face disproportionate obstacles to securing and maintaining employment, and they could be served more effectively if those barriers are considered and addressed strategically, with state-level coordination and support. St. Joseph's Center also supports the subgoals to address factors that prevent individuals from entering or re-entering the workforce; remaining in the workforce; getting hired; maintaining a job; and working in a career that has good job quality, earning a family-sustaining wage (or leads to it through a career pathway), is safe, is sustainable, and suits their interests and skills. Addressing some of these barriers may also help achieve the goal of addressing worker shortages in critical</p>	Thank you for your feedback. The Commonwealth is committed to finding solutions to ensure all jobs, including jobs in childcare, are quality jobs.

		<p>industries.</p> <p>St. Joseph's Center fully supports the strategy to better equip the workforce development system to address housing instability and support local and regional solutions. The lack of affordable housing is a huge barrier and adds to the housing instability the Commonwealth is currently facing. Workers who are facing housing insecurity also struggle to maintain focus while working. Workers' struggles outside of work can impact their ability to work.</p> <p>St. Joseph's Center commends the effort to work with workforce development system partners to improve childcare and dependent care access, affordability, and availability in the needed places and at the needed times to enable full employment for individuals. There seems to be a cyclical issue that needs to be addressed. It is understood that quality childcare staff are needed. In order to attract quality staff, agencies need to pay them a family-sustaining wage. Increasing the wages is then passed along to the families in need of childcare services, thus making quality childcare unaffordable. The Commonwealth needs to invest in subsidized wages for childcare workers so that the full burden of the wage is not solely on the families who need childcare. The Commonwealth will not be able to face the barrier of quality childcare without investing in family-sustaining wages for childcare workers.</p> <p>St. Joseph's Center encourages the attempt to continue to explore and implement ways to collaboratively support individuals for whom transporting is a barrier to employment. Transportation continues to be a struggle for second and third shift employees in areas where 24/7 public transportation is not offered. St. Joseph's Center commends the strategy to make transportation more affordable, available, and accessible.</p>	
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49	St. Joseph's Center	<p>Addressing Worker Shortages in Critical Industries</p> <p>St. Joseph's Center supports the Commonwealth's commitment to addressing the pressing issue of worker shortages in critical industries, recognizing the pivotal role these industries play in the region's economic growth and stability. St. Joseph's Center applauds the initiative to address worker shortages in healthcare and long-term care industries, focusing on direct care and community health sectors, by increasing the number of qualified healthcare and long-term care professionals. However, Direct Support Professionals need to be considered as a vital position in a critical industry. St. Joseph's Center urges the Commonwealth to consider Direct Support Professionals a high priority occupation (HPO) and needs the Commonwealth to recognize their role in this plan. The plan names examples of healthcare professionals such as nurse aides, home health aides, home care, and community health workers but does not include DSPs.</p> <p>St. Joseph's Center understands the need to address worker shortages in critical industries by promoting alternative pathways to certifications and credentialing. Direct Support Professionals have credential programs that often go unrecognized, such as the National Alliance for Direct Support Professional (NADSP) credential program and the NADD Competency-Based IDD/MI Dual Diagnosis Direct Support Professional Certification Program. St. Joseph's Center urges the Commonwealth to recognize these credential programs and advocates for recognition and financial support of these programs.</p> <p>In addition, the Commonwealth needs to make a financial investment in the wages of Direct Support Professionals to attract workers to the profession. Even if education about the role of a DSP is enhanced, the industry will still face worker</p>	<p>Thank you for your comment.</p> <p>Direct Support Professionals, listed as an alternative job title under Home Health Aides (SOC 31-1121) or Personal Care Aides (SOC 31-1122) , are a 2023 High Priority Occupation (HPO) in the North Central Workforce Development Area. Given this designation, individuals from any area may be eligible for WIOA training dollars in Pennsylvania once a training program application is approved through the North Central Workforce Development Board and added to the statewide Eligible Training Provider List.</p> <p>The petition period for PY 2024 HPOs will open in April 2024 and will remain open for at least 45 days. To potentially have Direct Support Professional occupations included on all 2024 HPO Lists, we recommend working with each local Workforce Development Board to submit a petition for one or both of the occupational titles above.</p>
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50	St. Joseph's Center	<p>Continuous improvement of the Workforce Development System</p> <p>St. Joseph's Center supports identifying and enacting system changes and improvements that enhance the collaboration and partnership between agencies and partners in the workforce development system. St. Joseph's Center understands that constant improvement through partnerships is needed to see the success of this plan.</p>	Thank you for your feedback. We agree that continuous improvement of the workforce development system is critical.
51	Rehabilitation & Community Providers Association	<p>With close to 400 members, the majority of who serve over one million Pennsylvanians annually, Rehabilitation and Community Providers Association (RCPA) is among the largest and most diverse state health and human services trade associations in the nation. RCPA provider members offer mental health, substance use disorder, intellectual and developmental disabilities, children's, brain injury, criminal and juvenile justice, medical and pediatric rehabilitation, and physical disabilities and aging services, across all settings and levels of care.</p>	Thank you for the feedback. OVR was also recently awarded a \$9.9M Disability Innovation Fund (DIF) grant entitled Pathways to Partnership. This grant is specifically written to increase training and collaboration between OVR, schools, Centers for Independent Living, and ODP. Services and training will begin in year two of the grant in 2025. Through the implementation of this grant, we

	<p>Many of our members provide employment services to individuals with disabilities. We would like to submit the following feedback regarding the draft Pennsylvania Workforce Innovation and Opportunity Act (WIOA) Combined State Plan Modification for the period of July 1, 2024, through June 30, 2028.</p> <p>We support and believe strongly in Competitive Integrated Employment and efforts to increase access to CIE. Our members provide a full range of employment services and are grateful for the opportunities to partner with OVR as we as ODP, and school districts. In addition to supporting individuals finding CIE, many of our members provide small group employment and supported employment, as well as facility-based services. The current perception that when individuals are served in these settings, they never move to less supported settings is incorrect. We would like to share that many providers are successful in enabling individuals to gain more independent employment as a result of developing both work and soft skills in these programs.</p> <p>Focusing exclusively on CIE, while well-intentioned, could have an unintended consequence and not increase CIE, but rather hurt individuals who may benefit from services not available to them. You now have individuals that will receive no services at all – including those that could build skills to be prepared for CIE.</p> <p>Additionally, many families have shared that there is often a delay in obtaining an assessment from OVR (4-6 months), during which time the individual is at home, often without any alternative service. When the students graduate and are either waiting for the assessment or have received the assessment and have not been provided the document that identifies they are not yet ready for CIE, they are left in limbo, not receiving any</p>	<p>believe that a variety of issues expressed in this comment will be addressed.</p>
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